TSD File Inventory Index

Date: December 15, 2006

Initial: [illegible]

Facility Name: Barber Coleman Company (One Folder Site)

Facility Identification Number: ILD 005 145 958

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence		.1 RFA Correspondence	Y
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: On file at site.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

July 24, 1995

ENVIRONMENTAL PROTECTION AGENCY
ATTN MICHELLE ALLEN
2200 CHURCHHILL RD
SPRINGFIELD IL 62794

RE: US EPA ID Number ILD 005 145 958

Location: 1300 ROCK ST

ROCKFORD IL

In response to your correspondence of 6 7 95, the following information has been updated:

NAME OF INSTALLATION TO BARBER COLMAN CMF

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

JUL 1 1982

Arne Venteris
Barber-Coleman Company Rock Street Plant
1300 Rock Street
Rockford, Illinois 61101

RCRA ACTIVITIES

RE: Interim Status Acknowledgement USEPA ID No. ILD005145958
FACILITY NAME: Barber-Colemen Company Rock Street Plant

Dear Mr. Venteris:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

RS 6/30/82

Enclosure

cc: Robert E. Borchardt, Vice President-Barber-Colemen Company Rock Street Plant

PAF

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD005145958 REACKNOWLEDGEMENT

BARBER-COLMAN COMPANY ROCK ST PLANT
1300 ROCK ST
ROCKFORD IL 61101

INSTALLATION ADDRESS ➤

1300 ROCK STREET
ROCKFORD IL 61101

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NO.

A. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000295 AUG 14 80

ILD005145958

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F ILD005145958 T/A 2 C 1

APPROVED: A

DATE RECEIVED (yr., mo., & day): 800818

I. NAME OF INSTALLATION

BARBER-COLMAN COMPANY ROCK ST PLANT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 1300 ROCK STREET

CITY OR TOWN: 4 ROCKFORD ST.: IL ZIP CODE: 61101

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 1300 ROCK STREET

CITY OR TOWN: 6 ROCKFORD ST.: IL ZIP CODE: 61101

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 ARNE VENTERIS FACILITIES ENG.

PHONE NO. *(area code & no.)*: 815-968-6833

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 BARBER-COLMAN COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [XX] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [XX] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD005145958

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 13 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S														T/A	C
W	I	D	0	0	5	1	4	5	9	5	8	2			1
1	2												13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F007	F008	F009	F017	
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P029	P030	U210	U228		
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Lawrence C. Petersen	L.C. Petersen Manager Corporate Maint. Eng.	Aug 8, 1980

EPA Form 8760-12 (6-80) REVERSE

DETACH

DETACH

REED CHATWOOD, INC.
Successor to The Textile Machinery Division
Barber-Colman Company

P.O. Box 1200 • 1300 Rock Street
Rockford, Illinois U.S.A. 61105-1200
(815) 968-6831 • TTT 4330367

March 29, 1985

United States Environmental Protection Agency
Region V
111 West Jackson Blvd.
Chicago, IL 60604

~~ILD005145958~~ I.D. #A

Dear Sir:

Reed-Chatwood, Inc. recently purchased the Rock Street facility of Barber-Colman Company, 1300 Rock Street, Rockford, Illinois. Barber-Colman Company leases from Reed-Chatwood the space occupied by their Plating and Heat Treat operations.

Barber-Colman has elected to retain U.S.E.P.A. Generator #ILD005145958, which will cover their Plating and Heat Treating operations.

At this time, Reed-Chatwood is applying for a U.S.E.P.A. generator number. Attached is a notification of hazardous waste activity.

Yours truly,

Weiland H. Akerman
Plant Engineer

lm

Attachment

RECEIVED
APR 11 1985
WMD-RAIB
EPA, REGION V

CONVERSATION RECORD

TIME: 3:45 p.m. DATE: 7-31-85

TYPE: ☐ VISIT ☐ CONFERENCE ☒ TELEPHONE ☐ INCOMING ☒ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO.
Weiland Ackerman	Reed Chatwood	815-968-6823

SUBJECT: Requesting Federal I.D. Number

ROUTING	
NAME/SYMBOL	INT

SUMMARY: I called Mr. Ackerman because I was confused with his letter of March 29, 1985. I asted him to give me the details of his operation.

Mr. Ackerman explained that his Company (Reed Chatwood) bought part of Barber-Colman which was the Textile Division, and that Barber-Colman is still a TSD operating the Plating & Heat Treatment. Reed Chatwood is a generator at this 10-15 acre facility (same address) but different P.O. Box Number.

Mr. Ackerman explained that he has some haz. waste that he needs to get rid of, and this is why he sent a notification in.

ACTION REQUIRED: Judy Greenberg will take care of assigning a Number.

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Mary Villarreal	Mary Villarreal	7-31-85

ACTION TAKEN: I.D.

SIGNATURE	TITLE	DATE

PA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

JUN 07 1995

U. S. EPA, REGION V
SWB — PMS

RECEIVED
JUN 6 - 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

June 1, 1995

U.S. EPA -- Region 5
Information Management Section
Attn: Sharon Kiddon HRM-7J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Name Chg

Dear Ms. Kiddon:

I am submitting the following changes for entry into RCRIS. This information was obtained during RCRA inspections conducted by IEPA during the middle of FY 1995.

RCRIS ENTRY JUN 22 1995 DH

EPA ID #		
ILD102372315	**CHANGE NAME FROM:**	ACCRA PLASTIC TOOLING, INC.
	TO:	ACCRA INDUSTRIES, INC.
ILD005145958	**CHANGE NAME FROM:**	COLMAN METAL FINISHING
	TO:	BARBER COLMAN-CMF
ILD984812545	Bank of Commerce and Industry is no longer at this location. This ID # should be deactivated. The NRG code should be #7.	
ILD982426447	B & A Cleaners is no longer at this location. The new business is not generating hazardous waste. This ID # should be deactivated. The NRG code should be #7.	
ILD021303607	Associated Litho is no longer in operation. This ID # should be deactivated. The NRG code should be #7.	
ILD984845610	Action Marine is no longer generating hazardous waste. This ID # should be deactivated. The NRG code should be #6.	

I have enclosed copies of the latest inspection reports for the above mentioned sites. Please contact me when these changes have been made in RCRIS. If you have any questions concerning the above information, please call me at 217/524-9140.

RECEIVED
WMD RECORDS
AUG 07

Sincerely

Michelle Allen

Michelle Allen
Field Operations Section
Division of Land Pollution Control
Bureau of Land

Attachments

A.4 Closure/ Post-Closure

Vill Ark.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 2010300051 -- Winnebago County
Barber-Colman Company
Closure Plan Approved: March 17, 1987, April 14, 1987, and October 8, 1987
ILD005145958 - 1, TSD, PA
RCRA-Closure

Log #C-283

May 5, 1988

Mr. Rod K. Johnson
Barber-Colman Company
555 Colman Center Drive
P.O. Box 7040
Rockford, Illinois 61125-7040

Dear Mr. Johnson:

The subject hazardous waste management facility was inspected by a representative of this Agency on April 15, 1988. The inspection revealed that the closure activity was completed in accordance with the approved closure plan.

Certification that the container storage areas A, B, C and D (S01) have been closed in accordance with the approved closure plan by the owner/operator, John W. Mink, and an independent registered professional engineer, James E. Huff, P.E., of Illinois was received at this Agency February 1, 1988.

The Agency has determined that the closure of the container storage areas have apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has approved your modified Part A application dated January 7, 1987 to reflect the status change due to completed closure activities.

This facility must continue to meet the requirements of 35 Ill. Adm. Code Part 722 -- Standards Applicable to Generators of Hazardous Waste.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W Eastep by CAZ

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KN:rd1333j/30-31

cc: Rockford Region
USEPA Region V, Mary Murphy
USEPA Region V, Art Kawatachi
James E. Huff, P.E.
Division File
Andy Vollmer
Compliance Section

Jim M

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Log No. 283-M-2
Received: September 25, 1987

Refer to: 2010300054 -- Winnebago
Rockford/Barber-Colman Co.
ILD005145958
RCRA-Closure

October 8, 1987

Barber-Colman Company
Attn: Rod K. Johnson
555 Colman Center Drive
P.O. Box 7040
Rockford, IL 61125-7040

Dear Mr. Johnson:

The closure plan modification submitted by yourself has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (S01) storage area is hereby approved subject to the following conditions.

1. Closure activities must be completed by November 30, 1987. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by January 29, 1988.

2. The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted has been forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".

3. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

4. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan.

5. A request for release of financial assurance documents should be included with the closure certification documents.

6. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

7. Soil samples shall meet the following conditions:

Parameters (E.P. Toxicity)	Action level mg/l
Chromium	1.0
Nickel	1.0
Zinc	1.0
Cyanide	0.025
Copper	0.02

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:mab/3835g/32-33

Attachment

cc: Rockford Region
Division File - Closure
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Registration Number

Date

EMD:mab/0885g/34

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Closure Plan Review
Facility Name: BARBER COLMAN
USEPA ID #: 005145958
2010300054

BARBER-COLMAN CO.
1300 ROCK STREET
ROCKFORD, IL. 61101

OCT 24 1986

Dear SIR,

As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call PERMIT SECTION at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

RECEIVED
NOV 4 1986
U.S. EPA, REGION V

LWE:CA:tk:5/2/9

Enclosures

cc: David A. Stringham, USEPA - Region V
Permit Section
Division File

IL 532-1428
LPC 217 11/85

Verson

BARBER COLMAN COMPANY

September 23, 1983

United States Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Attn: Regional Administrator

Gentlemen:

I am the chief financial officer of Barber-Colman Company, 555 Colman Center Drive, Rockford, IL 61125. This letter is in support of the use of the financial test to demonstrate financial responsibility for closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner identified above guarantees through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure care of the following facilities owned and operated by Barber-Colman Company or its subsidiaries. The current cost estimates for the closure care so guaranteed are shown for each facility.

ILD005145958

1300 Rock Street, Rockford, IL	$14,782
1354 Clifford Avenue, Loves Park, IL	$ 3,687 ILD074887585
1351 Windsor Road, Loves Park, IL	$ 4,309

ILD070168968

This owner is not required to file a form 10K with the securities and exchange commission for any fiscal year.

The fiscal year of this owner ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's independently audited year-end financial statements for the latest completed fiscal year, ended January 1, 1983.

RECEIVED
NOV 15 1983
WASTE MANAGEMENT BRANCH

-continued-

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

Alternative I

1.	Sum of current closure costs estimates	$ 22,778
2.	Amount of annual aggregate liability coveraged to be demonstrated	0
3.	Sum of lines 1 and 2	$ 22,778
* 4.	Total Liabilities	$ 43,799,000
* 5.	Tangible Net Worth	$109,675,000
* 6.	Net Worth	$109,675,000
* 7.	Current Assets	$110,278,000
* 8.	Current Liabilities	$ 28,718,000
9.	Net Working Capital	$ 81,560,000
*10.	The Sum of Net Income Plus Depreciation, Depletion, and Amortization	$ 18,330,000
*11.	Total Assets in U.S. (90%)	Not Required

		YES	NO
12.	Is line 5 at least $10,000,000	X	
13.	Is line 5 at least 6 times line 3	X	
14.	Is line 9 at least 6 times line 3	X	
*15.	Are at least 90% of assets located in the U.S. - if not, complete #16.	X	
16.	Is line 11 at least 6 times line 3	Not Required	
17.	Is line 4 divided by line 6 less than 2.00	X	
18.	Is line 10 divided by line 4 greater than .01	X	
19.	Is line 7 divided by line 8 greater than 1.5	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.15(g) as such regulations were constituted on the date shown immediately below.

4 November 83
Date

R. T. Leighton, Vice President, Finance

Coopers
&Lybrand

certified public accountants

Barber-Colman Company
Rockford, Illinois

We have agreed the figures marked with an asterisk in the accompanying letter from Barber-Colman Company's Chief Financial Officer to Barber-Colman Company's 1982 Annual Report. It is understood that this report is solely for the information of the Illinois Environmental Protection Agency and is not to be used for any other purpose.

Because the above procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the figures referred to above. In connection with the procedure referred to above, no matters came to our attention that caused us to believe that the figures should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only to the figures specified above and does not extend to any financial statements of Barber-Colman Company, taken as a whole.

Coopers & Lybrand

Rockford, Illinois
October 7, 1983

ILD 005145988

BARBER COLMAN COMPANY

January 19, 1983

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

Attn: Bill Radlinski

Dear Mr. Radlinski:

Attached is a binder evidencing gradual pollution liability which was purchased and put in force 1/15/83. By copy of this letter we are putting the USEPA on notice of this coverage also.

We will forward the official required certificate of insurance as soon as it is received. We have kept the sudden and accidental coverage in force with our comprehensive general liability policy and those certificates were previously filed with the IEPA.

Sincerely,

G. P. Lesieutre
Risk Manager

GPL:bw

Enc.

cc: LCPetersen
USEPA

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

N° 467041

CASUALTY INSURANCE BINDER

LIBERTY MUTUAL

LIBERTY MUTUAL INSURANCE COMPANY • LIBERTY MUTUAL FIRE INSURANCE COMPANY • BOSTON

INSURED: Barber-Colman Company

ADDRESS: 555 Colman Center Dr., Rockford, IL 61125-7040

Pending the issuance of the policy or policies of the type or types described below, LIBERTY MUTUAL INSURANCE COMPANY or LIBERTY MUTUAL FIRE INSURANCE COMPANY agrees to insure the insured, but only for the coverages and hazards indicated, in accordance with the provisions of the policy or policies in current use by it. The limit of the Company's Liability or Amount of Insurance against each such coverage and hazard shall be as stated herein, subject to all the terms of the policy having reference thereto, and no insurance is provided for coverages or hazards for which no such limit or amount is stated. Issuance of the executed policy or policies voids this binder as of the effective date of such policy.

This binder may be canceled (1) by the company by written notice to the insured at the address shown above stating when thereafter such cancelation shall be effective, or (2) by the insured by mailing written notice to the company stating when thereafter such cancelation shall be effective.

This binder shall be effective on 1/15/83 at 12:01 A.M., and, unless previously canceled, shall expire on 3/16/83, at 12:01 o'clock A.M., Standard Time, at the address of the insured.

POLICY SYMBOL	POLICY NUMBER (TO BE ASSIGNED)	TYPE OF POLICY	LOCATION NUMBER	LOCATIONS TO WHICH BINDER APPLIES
LW		Pollution Liability	1-7	See attached schedule

LIMITS OF LIABILITY FOR WORKERS' COMPENSATION, EMPLOYERS' LIABILITY AND GENERAL LIABILITY HAZARDS:

WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY

POLICY SYMBOL	STATES COVERED	LIMIT OF LIABILITY COVERAGE B
		$

GENERAL LIABILITY

POLICY INDEX	LOCATION NUMBER	HAZARDS* COVERED	BODILY INJURY LIMITS: EACH OCCURRENCE	BODILY INJURY LIMITS: AGGREGATE FOR PRODUCTS	PROPERTY DAMAGE LIMITS (NO AGGREGATE LIMIT FOR ELEVATORS OR CERTAIN PREMISES—OPERATIONS HAZARDS): EACH OCCURRENCE	PROPERTY DAMAGE LIMITS: AGGREGATE
			$	$	$	$

*Hazards insured at each location are specified in the "Hazards Covered" column by number: 1. Premises Operations—Elevators; 2. Independent Contractors—Protective; 3. Products—Completed Operations; 4. Contractual; 5. Medical Payments

POLICY SYMBOL	SPECIAL PROVISIONS OR AMOUNTS OF INSURANCE FOR OTHER CASUALTY POLICIES
LW	CLAIMS MADE POLICY FOR POLLUTION LIABILITY INSURANCE Limit of Liability: $3,000,000 per incident $6,000,000 aggregate Deductible: None

This binder when duly countersigned is issued on behalf of LIBERTY MUTUAL INSURANCE COMPANY or LIBERTY MUTUAL FIRE INSURANCE COMPANY, herein referred to as the Company as respects the indicated coverages under forms customarily written in such Company.

LIBERTY MUTUAL INSURANCE COMPANY
LIBERTY MUTUAL FIRE INSURANCE COMPANY

SECRETARY PRESIDENT

Countersigned By Authorized Representative

SALES REP AND SALES OFFICE	
Hedrick-Rockford	
POLICY ISSUING OFFICE	NEW OR REN.
So. Bend	new
TYPED BY	DATE
T. Freese	1/14/83

BS 226 R5 Printed in U.S.A.

BARBER-COLMAN COMPANY PLANTS

4910 Moores Mills Road
Huntsville, AL 35222 (Air Dist.)

7510 Virginia Road
Crystal Lake, IL 60014 (OEM - Motor Div.)

1215 Industrial Street
Reedsburg, WI 53959 (Colman AC Motors, Inc.)

100 Sagamore Hill Rd.
Pittsburg, PA 15239 (Robicon - Pittsburg Ind. Instruments

1300 Rock St.
Rockford, IL 61101

1354 Clifford Ave.
Loves Park, IL 61111

1351 Windsor Road
Loves Park, IL 61111

ILD 005145958

REVISED: ADDRESS CHANGE

HAZARDOUS WASTE FACILITY CERTIFICATE OF POLLUTION LIABILITY INSURANCE

1. Liberty Mutual Insurance Company, 175 Berkeley Street, Boston, Massachusetts, hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to:

(Name of Insured) Barber-Colman Company (the "insured"),

(Address) 555 Colman Center Drive, Rockford, IL 61125

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

(Name and Address of Each Facility) (EPA Identification Number)

SEE ATTACHED SCHEDULE

RECEIVED
DEC 20 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

for ☒ sudden accidental occurrences,
☐ sudden and nonsudden accidental occurrences.

The limits of liability are: $ 1,000,000 annual aggregate

$ 1,000,000 each pollution incident

exclusive of legal defense costs.

The coverage is provided under policy number LG1-641-004062-042,
issued on (date) 3/29/82.
The effective date of said policy is (date) _____.
The effective date of said pollution coverage is (date) 7/15/82.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

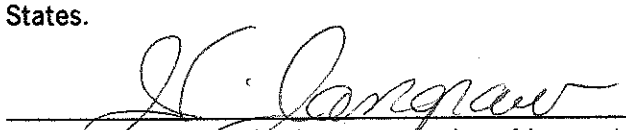
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the Facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



(Signature of authorized representative of Insurer)

J.F. Jangraw Production Manager

(Type Name and Title)

1775 Lisbon Road, P.O. Box 4600

(Address of Representative)

Lewiston, ME 04240

NAME & ADDRESS OF EACH FACILITY	EPA IDENTIFICATION NUMBER
REGION 3	
Robicon 100 Sagamore Hill Rd., Pittsburgh, PA	To Be Determined
REGION 4	
Barber-Colman Company 4910 Moores Mills Rd., Huntsville, AL	To Be Determined
REGION 5	
Barber-Colman Company 7510 Virginia Rd., Crystal Lake, IL	To Be Determined
AC Motors 1215 Industrial St., Reedsburg, WI	To Be Determined
Barber-Colman Company 1300 Rock St., Rockford, IL 61101	To Be Determined
Barber-Colman Company 1354 Clifford Ave., Rockford, IL 61111	To Be Determined
Barber-Colman Company 1351 Windsor Rd., Rockford, IL 61111	To Be Determined

ILD005145958

ILD070768968

BARBER COLMAN COMPANY

February 3, 1988

R.C.R.A. Activities
U.S.E.P.A. - Region 5
Waste Management Division
#5HS-13
Chicago, IL 60604

Attn: Mr. James Mayka

Ref: I.E.P.A. Log #C-283-M-2

Dear Mr. Mayka:

I am mailing one (1) copy of the completed Closure Plan Certification for Barber Colman's 1300 Rock Street, Rockford, IL 61101 facility; U.S.E.P.A. #ILD005145958; Ill. Generator #2010300054. The original and an extra copy were mailed to Springfield 1/28/88.

Sincerely,

Rod K. Johnson

Rod K. Johnson

RKJ/grc

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

January 29, 1988

Received of Barber Colman Company's 1300 Rock Street Facility USEPA # ILD005145958; Illinois I.D. #2010300054 - two (2) copies of Closure Plan I.E.P.A. Log #C-283-M-2.

1-29-88

DATE

Representative - Rockford Branch I.E.P.A.

Barber-Colman Representative

BARBER-COLMAN

COLMAN METAL FINISHING

1300 ROCK STREET LOCATION

ROCKFORD, ILLINOIS

COMPLETE DOCUMENTATION OF I.E.P.A.

CLOSURE PLAN AND EXECUTION

CHANGING STATUS FROM T.S.D.

TO "GENERATOR ONLY"

PREPARED BY:

ROD JOHNSON

JANUARY 27, 1988

USEPA #ILD005145958
I.D. #2010300054

January 27, 1988

Mr. Lawrence W. Eastep
Permit Sector
Div. of Land Pollution Control --- #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

RE: IEPA Log #C-283-M-2
Barber-Colman Closure Plan
ILD005145958-USEPA#
2010300054-IL. I.D.#

Dear Mr. Eastep:

The attached document details our implementation of all phases of the 10-08-87 approved Closure Plan for Barber-Colman's 1300 Rock Street Facility.

Very truly yours,
Barber-Colman Co.

Rod K. Johnson

Rod K. Johnson

RKJ/grc

cc: E.W. Terneus
J. Mink
L.C. Petersen
J. Huff
Robert Wengrow - Rockford Region
USEPA - Region V - Jim Mayka

TABLE OF CONTENTS

TABLE OF CONTENTS

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Log No. 283-M-2
Received: September 25, 1987

Refer to: 2010300054 -- Winnebago
Rockford/Barber-Colman Co.
ILD005145958
RCRA-Closure

October 8, 1987

R. K. JOHNSON
OCT 14 1987

Barber-Colman Company
Attn: Rod K. Johnson
555 Colman Center Drive
P.O. Box 7040
Rockford, IL 61125-7040

Dear Mr. Johnson:

The closure plan modification submitted by yourself has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (S01) storage area is hereby approved subject to the following conditions.

1. Closure activities must be completed by November 30, 1987. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by January 29, 1988.

2. The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted has been forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".

3. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

4. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

Page 2

5. A request for release of financial assurance documents should be included with the closure certification documents.

6. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

7. Soil samples shall meet the following conditions:

Parameters (E.P. Toxicity)	Action level mg/l
Chromium	1.0
Nickel	1.0
Zinc	1.0
Cyanide	0.025
Copper	0.02

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:mab/3835g/32-33

Attachment

cc: Rockford Region
Division File - Closure
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. At least one copy of the certification must contain the original signatures.

Closure Certification Statement

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ILD005145958
USEPA ID Number

Barber-Colman Co.
Facility Name

Signature of Owner/Operator

John W. Mait V.P. Adm
Name and Title

Signature of Registered P.E.

James E. Huff IL o62-032933
Name of Registered P.E. and Registration Number

JAMES E. HUFF 32933 REGISTERED PROFESSIONAL ENGINEER OF ILLINOIS

1-28-88
Date

SG:st:1829g,70

September 23, 1987

Illinois Environmental Protection Agency
Permit Section
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706
Attn: Mr. Lawrence W. Eastep
Ref: Log #C283 Barber Colman Company
2010300054 - Winnebago
ILD005145958
R.C.R.A. Closure

Dear Mr. Eastep:

In order to complete our closure Plan in compliance with Subparts 725.211 - 725.215, we request an extension from September 30, 1987 to November 30, 1987 for the following reasons:

1. We have not succeeded in cleaning storage area B. (a 15' x 112' concrete area) to the 1.0 mg/l for total chromium, nickel, zinc, copper and cadmium due to deposits of these waste metals in spalled surface areas and deep cracks at the east end and west end.

2. We have divided the area into four segments; please reference attached drawing #B1.
   A. The east end segment #1 and west end segment #2 (15' x 15' x 6" thick concrete slabs) were jackhammered into pieces and dumped into two - twelve cubic yard rolloff boxes during the week of September 7. Analytical results yielded high chrome and zinc totals and E.P. Toxicity for each. Even though the percentage containing E.P. Toxic chrome and zinc in the concrete removed is less than 1% of total concrete removed, we plan to permit the two loads to a hazardous landfill.

   B. A 1/4" - 1/2" surface layer of the center (82' x 15' x 6" concrete) section, segment #3, was removed by scarification on August 29, 1987. The resulting fine, concrete dust was swept and shoveled into one - 55 gallon drum; this will be landfilled with the removed concrete in A. The area was washed thoroughly and a washwater sample (Aqualab #48631) passed the 1.0 mg/l for total chromium, cadmium, nickel, zinc and copper. A copy of lab analysis is included.

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

Barber-Colman Company

C. Our primary reason for requesting this extension is our management of what I will call segment #4, the soil beneath the concrete removed from segments #1 and #2. Because this is soil, we look to Closure Plan specifications for area D., also a soil area. Plan specifications place a limit of 1.0 mg/l for nickel, zinc and chromium on E.P. Toxicity. We have sampled each area at 12" and 30" depths. E.P. Toxicity results are greater than 1 mg/l at 12" but much less than 1 mg/l at 30". We will remove all the soil in each area to a 30" depth and place into two -twenty cubic yard rolloff boxes with weather covers. This material will be permitted as a hazardous or a special waste depending on the E.P. Toxicity of the metals. At the 30" depth another sample from each end will be analyzed again for metals with the 1.0 mg/l level observed. If the results are negative, each hole will be back filled with sand and concrete poured.

We feel this is the best way to proceed. Please advise us of approval of this change and request for extension to complete our closure. Please call me at (815) 397-7400 ext. 6255 with questions.

Sincerely,

BARBER-COLMAN CO.

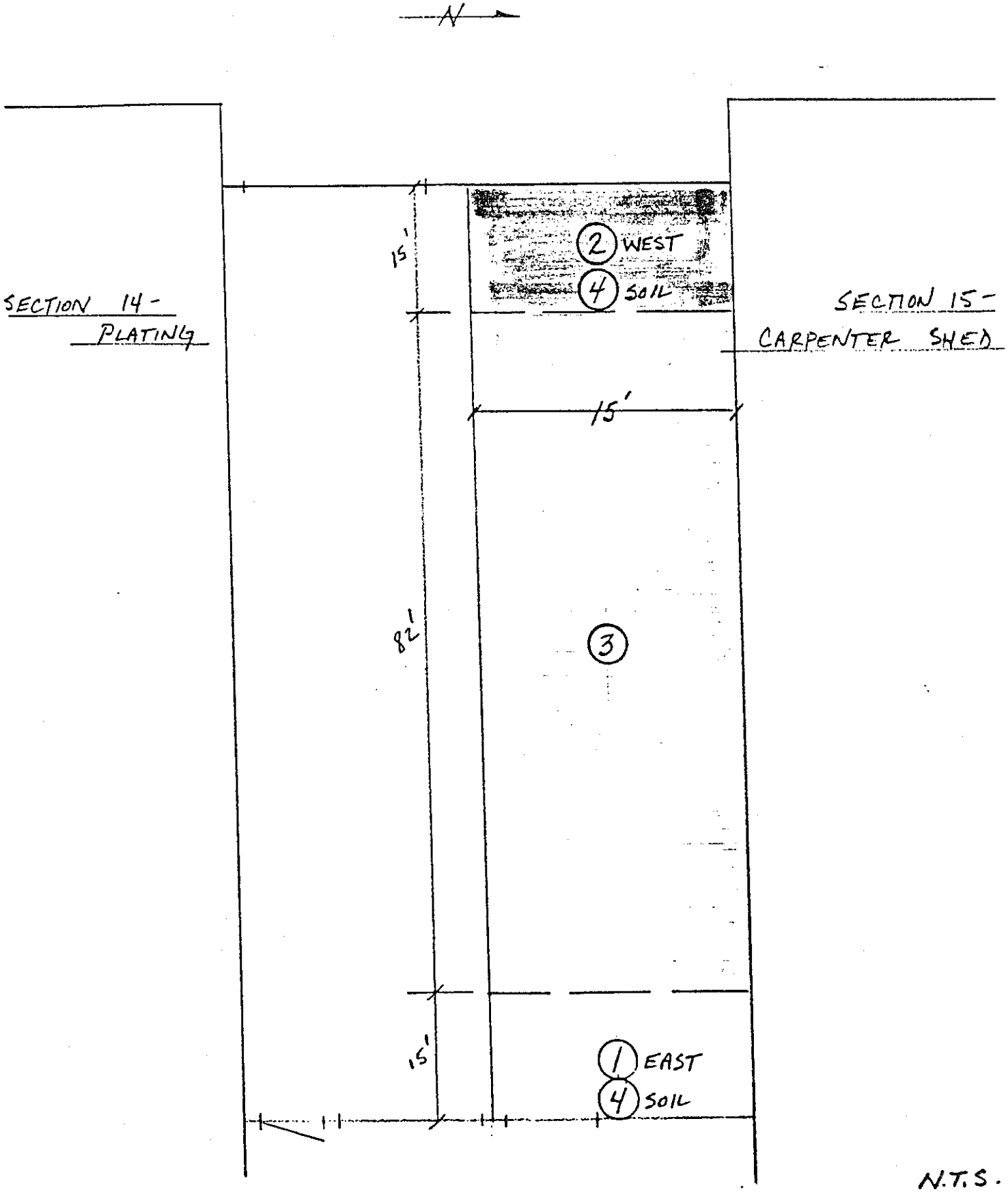
Rod K. Johnson

Rod K. Johnson

RKJ/gc

cc: Robert Wengrow, Rockford Branch I.E.P.A.
4302 N. Main St. - P.O. Box 915
Rockford, IL 61105
Tom Henninger - Rockford Branch I.E.P.A.
✓Jim Huff
L.C. Petersen
John Mink
E.W. Terneus

STORAGE AREA B
DRAWING # B1



N.T.S.
9-23-87

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

09-08-87

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

SAMPLE DESCRIPTION: Rock Street Washwater

Date Received: 08-31-87 0810

48630	Area A	08-29-87	1200	
	Nickel	4.8		mg/L
	Zinc	7.20		mg/L
48631	Area B	08-29-87	1200	
	Cadmium	0.080		mg/L
	Chromium, Total	0.910		mg/L
	Copper	0.110		mg/L
	Nickel	0.20		mg/L
	Zinc	1.00		mg/L
48632	Area C	08-29-87	1200	
	Chromium, Total	1.15		mg/L
	Nickel	1.10		mg/L
	Zinc	3.23		mg/L

Toni Gartner, Manager
Rockford Division

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Log No. C-283-M-1
Received: October 23, 1986,
February 10, 1987, and
April 9, 1987

Refer to: 2010300054 -- Winnebago County
Barber-Colman Company
ILD005145958
RCRA - Closure

April 14, 1987

Barber-Colman Company
Attn: Rod K. Johnson, Project Engineer
555 Colman Center Drive
P. O. Box 7040
Rockford, IL 61125-7040

Dear Mr. Johnson:

The modified closure plan submitted by Barber-Colman Company to change the size of storage area B from 28 x 112 feet to 15 x 112 feet has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (S01) sites is hereby approved. This approval is subject to the condition of the Agency's original approved closure plan letter dated March 17, 1987.

Should you have any questions regarding this matter, please contact Steve Gobelman at 217/785-6871.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:SG:tk:5/8/30

cc: Rockford Region
Division File - Closure
Financial Assurance
Jim Mayka, USEPA, Region V
Mary Murphy, USEPA, Region V
Compliance Section
Steve Gobelman

April 8, 1987

Mr. Lawrence W. Eastep, Manager
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill road
Springfield, IL 62706

Re: Log #C283; Barber Colman Closure Plan
ILD005145958; 2010300054; Winnebago County

Dear Mr. Eastep:

Planning the details to implement our 3/17/87 approved Closure Plan Revealed an oversight in our description of Storage Area (B). Pages 3 and 7 in the Original Plan, 10/20/86, and page 5 of 5 of our Revised Part A. Permit listed Storage Area (B) as 28' x 112'. I have included page 5 of 5 to show the entire site and attachment 1 to show Storage Area (B) in detail. As is indicated on attachment 1, the 28' x 112' area consists of a 15' x 112' area where waste has been stored and a 13' x 112' area trucking aisle and area for in process production. The 13' x 112' area does not technically have to be "closed" since it is a trucking aisle and not a storage site. We intend to cleanup the entire 28' x 112' area during implementation of the plan. However, it is necessary that we use the 13' x 112' aisle for access into and out of the plating area.

This letter documents our request to clarify and/or modify our closure in this way. This was done at the reccommendation of Steve Gobelman.

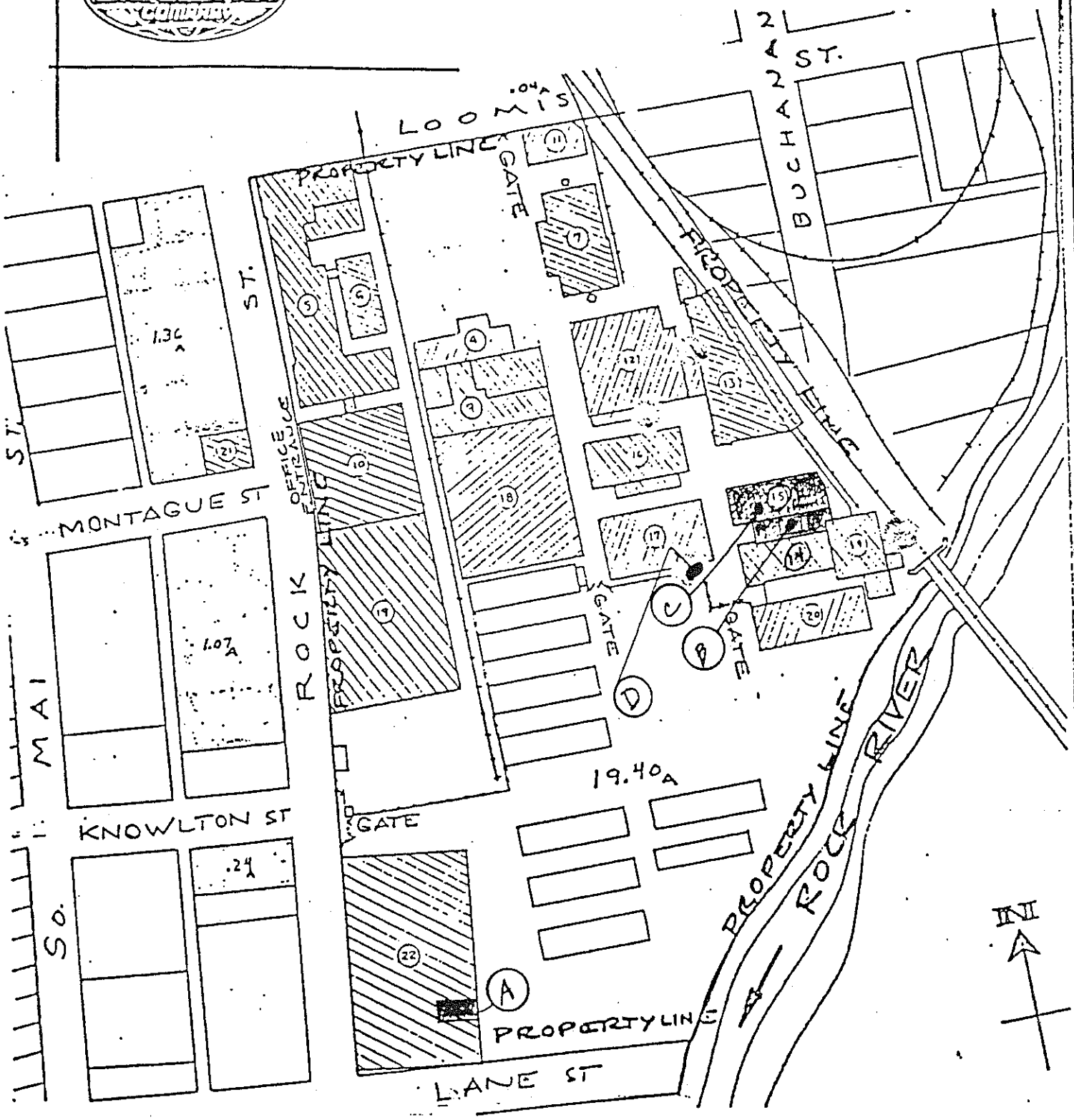
Sincerely,

Rod K. Johnson

Rod K. Johnson

cc: Robert A. Wengrow
Tom Henninger
E.W. Terneus
L.C. Petersen
Tom Severson
Jim Huff

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL



BARREL STORAGE

A - BUTLER BLDG. - SECT. 22 - 21' x 31' = 651' (Attachment A)

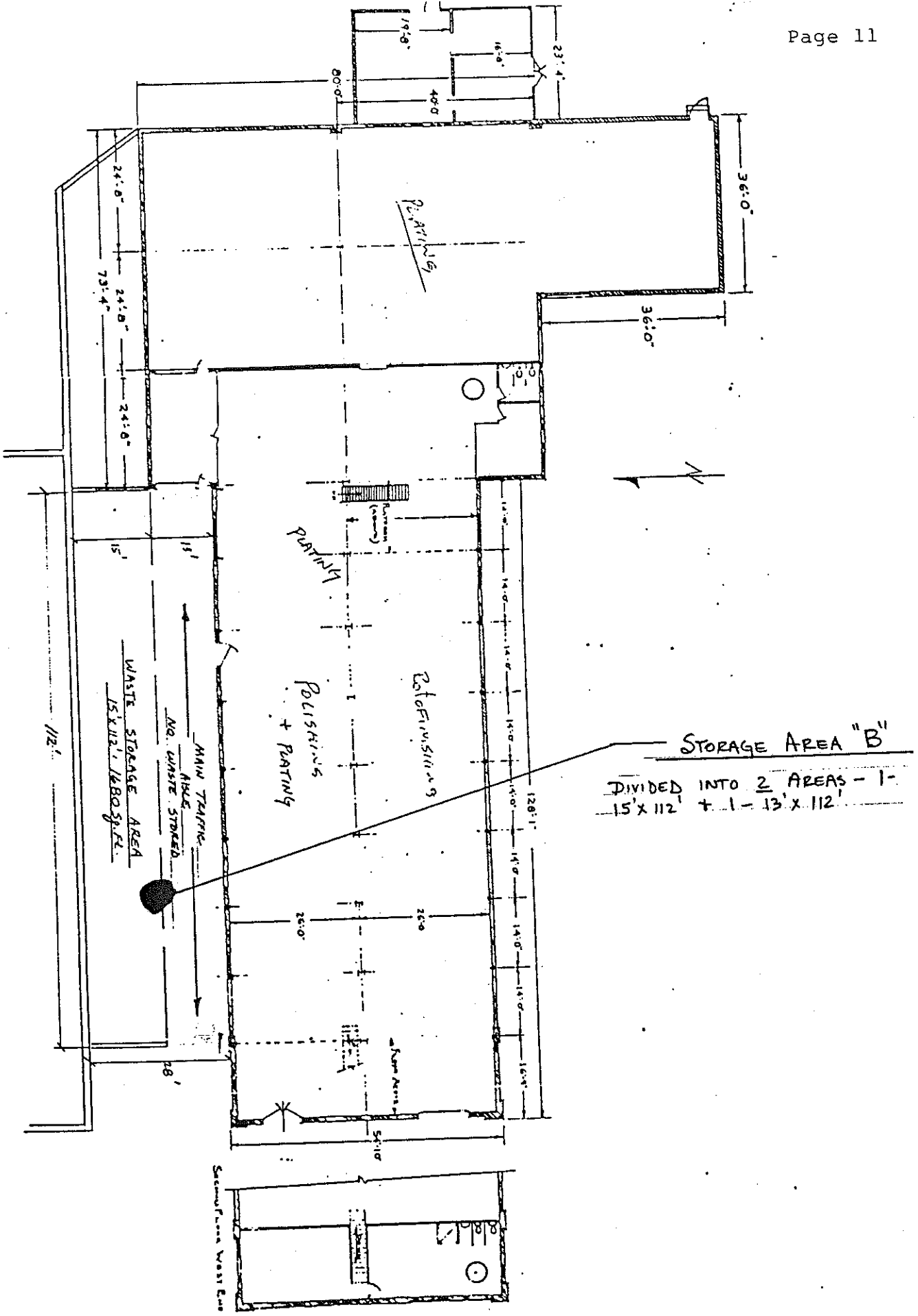
- COLD STOR. AREA - SECT. 14 - 28' x 112' = 3136 (Attachment B)

C - CARP. SHED - SECT 15 - VARIOUS - TOT 1566 (Attachment B)

D - EARTHEN AREA - (10' x 30') - SOUTH OF SECT. 17

ROCK STREET PLANT

SCALE 1" = 200'



Attachment 1

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706
217/782-6762

Log No. C-283
Received: October 23, 1986
and February 10, 1987

Refer to: 2010300054 -- Winnebago
Barber Colman Company
ILD005145958
RCRA-Closure

March 17, 1987

Barber Colman Company
Attn: Rod K. Johnson, Project Engineer
555 Colman Center Drive
Post Office Box 7040
Rockford, IL 61125-7040

Dear Mr. Johnson:

The closure plan submitted by Barber Colman Company has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (S01) sites and hereby approved subject to the following conditions.

1. When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 30 days after closure, or by September 30, 1987.

   The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

a. The volume of waste and waste residue removed.

b. A description of the method of waste handling and transport.

c. The waste manifest numbers.

d. A description of the sampling and analytical methods used.

e. A chronological summary of closure activities and the cost involved.

f. Photo documentation of closure.

g. Tests performed, methods and results.

All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

2. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

3. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan.

4. The washwater from storage area A, B and C will be analyzed and no further action will be necessary if the following conditions are met.

Parameters (totals)	Action level mg/l
Cyanide	1.0
Chromium	1.0
Copper	1.0
Nickel	1.0
Zinc	1.0
Cadmium	0.15
Total Organic Halogen (TOX)	2.13
1,1,1,Trichloroethane	7.2 mg/kg

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

2. The soil samples taken in the earthen storage area will be analyzed and no further sample will be necessary if the following conditions are met.

Parameters (E.P. Toxicity)	Action level mg/l
Chromium	1.0
Nickel	1.0
Zinc	1.0

Should you have any questions regarding this matter, please contact Steve Gobelman at 217/785-6871.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:SG:st:1829g,67-69

Attachment

cc: Rockford Region
Division File - Closure
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section
Steve Gobelman

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. At least one copy of the certification must contain the original signatures.

Closure Certification Statement

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Registration Number

Date

SG:st:1829g,70

Feb. 10, 1987

Mr. Larry Eastep, Manager
Permit Section
Division of Land Pollution Control
Illinois Environmental Protec. Agency
2200 Churchill Road
Springfield, IL 62706

Re: Log #C-283; Barber Colman Closure Plan
ILD005145958
2010300054 - Winnebago

Dear Mr. Eastep:

Attached are the following documents necessary to continue progress toward closure of Barber Colman's Rock Street Facility.

1. I.E.P.A letter 1/14/87 - your office - listing 8 items of original closure plan deficiencies.
2. Barber Colman responses to 1/14/87 letter.
3. Revision 2 Closure Plan; revised to eliminate deficiencies.
4. Copies of original Part A. Application Forms (3510-1 and 3510-3) and modified Part A. Forms (1/9/87 Revised).

We believe the above items will resolve the deficiencies raised in your 1/14/87 letter. Should you have additional questions or areas of concern with the closure plan, please call me.

Very truly yours,

Rod K. Johnson

Rod K. Johnson
Corp. Serv. Proj. Engr.

cc: Rockford Branch, I.E.P.A.
4302 N. Main St.
P.O. Box 915
Rockford, IL 61105

Attn: Robert A. Wengrow, R.S.
Rockford Region Mgr.

E.W. Terneus
L.C. Petersen
T. Severson

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Date Received: October 23, 1986
Log #C-283

Refer to: 2010300054 -- Winnebago
Barber Colman Company
ILD005145958
RCRA-Closure

January 14, 1987

Barber Colman Company
Attention: Rod K. Johnson, Project Engineer
555 Colman Center Drive
Post Office Box 7040
Rockford, Illinois 61125-7040

Dear Mr. Johnson:

The closure plan submitted by Barber Colman Company and prepared by Barber Colman Company has been reviewed.

Due to the following deficiencies, the plan has been found to be inadequate. Your closure plan did not include an adequate:

1. DESCRIPTION OF THE FACILITY - The plan should describe the type of industry, Standard Industrial Code (SIC Code), products, location, size and other general, summarized information. This does not have to be an extensive description.

2. DESCRIPTION OF THE WASTE MANAGEMENT UNITS TO BE CLOSED - Describe each unit which is to be closed and provide the process code and unit of measure code from the Part A (i.e., S01-1000 gal.). Include waste types for each unit (by standard chemical name and U.S. EPA code), time period of use, dimensions, topography, soil types (as appropriate), and any other relevant matters. Identify these units by reference to line numbers on the Part A application. Plans for complete closure must address all units on the Part A application. A copy of the following documents should be included in the closure plan:

   . the original Part A application (EPA Forms 3510-1 and 3510-3);

   . any revised Part A with proof of approval by USEPA or IEPA.

   If this is a partial closure (some units will remain active), include a request for modification of your Part A in the closure plan. This modification will be made after closure is certified by the IEPA.

3. STORAGE AREA PAVEMENT DESCRIPTION - Provide a description of the type of pavement surface at the storage area(s), structural integrity and containment structures (curbs). If containment structures are not present, describe the drainage features of the unit and its surroundings, and identify where spilled waste would flow. Additional sampling and analysis must be proposed to determine if releases have occurred to soil, groundwater or surface water.

4. DECONTAMINATION DESCRIPTION (35 IAC 725.214) - The owner/operator should describe all efforts to clean or decontaminate hazardous waste and its residues and constituents from tanks, paved areas, concrete, pipes, pumps, sumps and any other appurtenances to the hazardous waste management unit. The owner/operator may be requested to use any reasonable means to clean or decontaminate, including solvent washing, pressure washing, scraping or other means. A description of how waste material (rinse water, etc.) from decontamination will be managed should also be provided. Please note that residue from listed hazardous waste must be managed as a hazardous waste unless it is delisted under the provisions of 40 CFR 260.20 and 260.22.

   a. Tanks containing hazardous waste must be subjected to all reasonable means of decontamination before they should be considered "clean". This includes pressure rinses, solvent washes, manual sludge removal and other means. The independent engineer should certify the methods used and that a minimum amount of residue remains.

   b. Tanks which will be used for temporary storage (not to exceed ninety days) following closure should be drained and inspected. The owner or operator and a registered professional engineer should certify that the tank and its appurtenances are in good working condition and that the wastes which will be stored in the tank are compatible with those which were stored previously.

5. SAMPLING PLAN AND ANALYTICAL METHOD(S) DESCRIPTION (35 IAC 725.211) - Closures of units where there is any evidence of leaks or spills or potential for hazardous waste constituent (Appendix VIII) migration must include sampling of soil to determine the nature and extent of contamination of soil. Soil sampling should also be provided for container storage areas which are founded on soil or gravel or on concrete pads without curbs. All samples which are to be taken must be handled in accordance with 40 CFR, Part 261, Appendix III.

   An adequate soil sampling and analysis plan should include the following:

   a. parameters to be analyzed

   b. locations of samples (horizontal location and depth)

   c. background samples (when applicable)

d. sampling methods and equipment

e. analytical methods

f. evidence of a quality assurance/quality control plan for laboratory analyses

g. a clear statement of the proposed "clean" level for soil

SOIL SAMPLING AND ANALYSIS PLAN

Parameters for soil analysis may include any element or compound that is a hazardous waste or hazardous waste constituent (as specified in 35 IAC Part 721). Parameters should not only be based on knowledge of the wastes managed at the unit, but may also include other potential elements or compounds used at the facility which generated the waste.

Locations of soil samples must be selected to adequately determine the horizontal and vertical extent of all contaminants specified previously. To determine the horizontal extent of contamination, a grid system should be used. A grid system uses a regular pattern, either rectangular or triangular to determine regular or random sampling points. A circular pattern of sampling around a central point may also be used. One variation of regular sampling would include linear sampling along a drainageway, boundary or other linear dimension. A directed system would focus samples on an area of suspected contamination such as the downslope or downwind side of a waste storage unit. Grid sampling and directed sampling may both be used in the same closure plan.

For grid sampling, the following equation may be used to determine grid intervals and the number of samples in a given area:

$$GI = (A\#/GL)^{0.5}$$

The above establishes grid point intervals, proportioned to the size of the area for equal weighting, where:

GL = greatest length of the area to be gridded (feet)

A = area to be gridded ($feet^2$), and

GI = grid interval (feet).

This calculation of the size of grid interval may be modified by the IEPA if site-specific conditions warrant a smaller or larger interval. Grid intervals of 25-100 feet are common.

Whenever random sampling within a grid is chosen, the minimum number of samples must be acceptable to IEPA.

The interval for sampling soil at various depths may be dependent on several factors, including: (1) soil type and hydraulic conductivity; (2) suspected magnitude of surface contamination; (3) physical state of the waste and its mobility; (4) height of liquid head at the ground surface; (5) length of time that waste was present at the site; and (6) relative toxicity of the waste. The soil sampling increments should be 6 inches for the upper two feet of soil and 12 inches below a depth of two feet.

Background samples are needed when the hazardous waste constituent of interest naturally occurs in soil, such as heavy metals. A few toxic organics, such as phenol or formaldehyde, may be naturally produced, but their concentrations in soil would typically be very low and near or below detection limits. Background samples are used to statistically compare the natural condition to the potentially contaminated area. Background samples should be taken in areas minimally affected by the hazardous waste units and by the plant itself. They may be taken away from the owner/operator's property, but as close as possible. Background samples should be taken from soil depths and soil horizon materials similar to those of the potentially contaminated area.

Sampling methods and equipment, as well as laboratory analytical methods, should follow guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (see 40 CFR 260.11). Field sampling methods, including soil sampling, not included in SW-846 must be approved by IEPA before they are used in the closure. This includes methods such as drilling, borings, etc. When available, standard procedures, as defined by U.S. EPA, or IEPA or ASTM, should be followed.

A "clean" level for soil is obviously the end result of closure. The sampling plan should be structured so that it clearly determines when "clean" is achieved. IEPA may consider alternate concentration limits, but not without thorough technical justification for leaving greater than background concentrations in the soil. Ground water must be protected from any future contamination.

One recent publication, "Environmental Sampling for Hazardous Wastes" (Schweitzer, G.E. and J.A. Santolucito (eds.). 1984. ACS Symposium Series No. 267, American Chemical Society, Washington, D.C.), provides an overview of field sampling programs.

Underground tanks containing ignitable waste must be removed and underlying soil should be sampled for hazardous waste constituents that were in the tank. Tanks containing nonignitable hazardous waste may be abandoned in place if the tank is properly decontaminated, filled and capped, and soil testing verifies that there was no soil contamination.

6. PROPOSAL OF CLEANUP LEVELS FOR SOILS (35 IAC 725.211) - For disposal units and any areas contaminated with hazardous wastes or hazardous waste constituents, provide the proposed cleanup levels and justification for same. The Agency recommends the following parameters and guidelines for the cleanup of any soil contamination.

PARAMETERS	GUIDELINES
Cadmium	0.05 mg/l*
Copper	0.02 mg/l*
Chromium	1.0 mg/l*
Nickel	1.0 mg/l*
Zinc	1.0 mg/l*
Cyanide	0.025 mg/l**
1,1,1-Trichloroethane	7.2 mg/kg***

* Concentration in E.P. Toxicity extract
** Concentration in E.P. Toxicity extract performed at neutral pH
***Total soil concentration

7. STATEMENT OF FACILITY STATUS AFTER CLOSURE - The closure plan should clearly state the status of the hazardous waste facility after closure is completed. For example, it should state if a storage facility is to be operated as a generator (less-than-90-day storage), and it should describe whether closure is partial or complete. If partial, it should name both the units covered by the closure plan as well as those remaining in operation. It should indicate whether the facility will continue to be a generator and transporter (if applicable).

   Indicate which of the following categories describes the intended use of the facility:

   a. No treatment, storage or disposal will occur at this facility.

   b. Disposal will continue at this facility.

   c. This facility will continue to treat hazardous wastes.

   d. Less than 1,000 kg/month will be generated, and storage will be for less than 90 days.

   e. The facility will generate and store more than 1,000 kg/month for less than 90 days.

   f. The facility will generate and store more than 1,000 kg/month for more than 90 days.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

g. The facility will generate and store more than 100 kg/month, but less than 1,000 kg/month for less than 180 days (270 days if applicable).

h. The facility will be exempt from treatment storage and disposal (TSD) regulation under RCRA.

i. The facility will be a transporter of hazardous waste.

8. Does the wash water meet the Sanitary District's requirements after treatment?

Pursuant to 725.212(d), you must submit a revised closure plan within 30 days which adequately responds to the above noted comments. Failure to submit a revised plan within 30 days will be considered non-compliance with the interim standards of 725 Subpart G -- Closure and Post-closure and Subpart H -- Financial Requirements.

Should you have any questions concerning this matter, please contact Steve Gobelman at 217/785-6871.

Very truly yours,

Lawrence W. Eastep/lle

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:SG:jd/1233g/8-13sp

cc: Rockford Region
Division File
Financial Assurance Unit
Steve Gobelman 217-785-6871
USEPA Region V -- Mary Murphy
Compliance Monitoring

RESPONSE TO IEPA LETTER, DATED 1/14/87

ITEM 1 - DESCRIPTION OF THE FACILITY

As stated in the original Closure Plan of 10-20-86, Barber Colman leases manufacturing space from Reed Chatwood, Inc. at 1300 Rock Street. Metal heat treating (S.I.C. Code #3398) leases 9,460 square feet and electroplating/rotofinishing (S.I.C. Code #3471) leases 16,050 square feet for production and 6400 square feet for material/waste storage.

Heat treating and metal finishing is performed on products of Barber Colman's Industrial Instruments, Environmental Contols and Aircraft divisions. The facility also operates as a job shop for various Rockford area industries requiring heat treating and electroplating.

Please reference the attached layout, exhibit X, showing location within Reed Chatwood's facility.

ITEM 2 - DESCRIPTION OF THE WASTE MANAGEMENT UNITS TO BE CLOSED

With reference again to the original Closure Plan of 10/20/86, Attachment 2 pages 2,3,&4 has been revised (2/9/87) to include the information requested here. In the original plan, Attachment 2 addressed Closure Plan item 3 by describing maximum inventory in storage, listing each hazardous waste, their EPA codes and amounts at time of Closure.

Per your instruction, I have included copies of our original Part A application (EPA Forms 3510-1 and 3510-3) and original Part A approval letter. Our original Closure Plan submittal of 10/8/86 included a Part A revision. I have included a copy of our 1/9/87 revised Part A application with our 2/9/87 Revised Closure Plan. We anticipate approval of the Revised Part A with Closure Plan Approval.

ITEM 3 - STORAGE AREA PAVEMENT DESCRIPTION

Pavement at Storage Area A. is 2" - 3" thick blacktop with no visual signs of cracking or surface deterioration. This area is at the south end of the Butler Building refer to Exhibit X). The building is enclosed on 4 sides except on the long east wall where 10' overdoors are located at midpoint of every bay. A spill would flow east toward these openings due to floor pitch. We estimate 400 gallons would be contained within the building due to a 3" - 4" curb formed as the inside asphalt rises to blend with the outside drive (reference Exhibit Y).

Pavement at Storage Area B. is approximately level concrete with reasonable structural integrity. This unheated area (called the lean-to) is approximately 28' x 192' with containment walls on north, east and south and a 10' wide opening to the west. A large spill could eventually flow through this opening and into the N-S asphalt trucking aisle between buildings. Once into this aisle, surface irregularites would stop the flow.

Pavement at storage Area C. is approximately level concrete of excellent structural integrity. This area sees only very limited fork truck traffic. Of this heated area (called the carpenter shed), plating uses 2358 of the 7072 square feet for waste/material storage and in process work. The area is enclosed on all sides with 10' overdoors located at midpoint of east and west walls (reference Exhibit X). A large spill could eventually flow west into the same N-S asphalt trucking aisle as a spill from storage area B. Again, once there, surface irregularities would stop flow. A large spill could also flow east into an earthen area bounded by a 12' tall retaining wall.

Storage Area D. is an earthen area. Soil sampling has been detailed in the Closure Plan, Attachment 4, item D., pgs. 7 - 8.

RESPONSE TO IEPA LETTER, DATED 1/14/87

ITEM 4 - DECONTAMINATION DESCRIPTION

This item was covered in detail on pages 6 and 7 of the Closure Plan. The only items involved in this closure are drum storage areas. There are no tanks, pipes, pumps, sumps or any other appurtenances that are part of this closure. The concrete and paved drum storage areas will be swept followed by scrubbing, collecting the wash water with a wet-vac. This was covered in the Closure Plan.

ITEM 5 - SAMPLING PLAN AND ANALYTICAL METHODS DESCRIPTION

The sampling plan was also covered in detail on pages 6, 7, and 8 of the Closure Plan submitted previously. As stated in the Agency's letter, "Closures of units where there is any evidence of leaks or spills or potential for hazardous waste constituent migration must include sampling of soil to determine the nature and extent of contamination of soil." There is no evidence of leaks or spills at any of the four drum storage areas. Three are on impervious surfaces. Nonetheless, Barber-Colman committed in the Closure Plan to analyze for the parameters known to be present. In addition, soil samples were proposed for the one drum storage area on an earthen area (see next item).

As there is no history or evidence of spills or leaks from the storage areas, the extensive testing of the wash water is sufficient, and further sampling is not required under 35 IAC 725.211.

Specifically, the Agency identified seven "deficiencies" under Item 5. Each is addressed below.

a. Parameters to be analyzed - Pages 5, 6, 7 and 8 of Closure Plan specifically identified these parameters.

b. Locations of samples (Horizontal Location and Depth - The wash water samples represent a composite from washing an entire storage area.

   Storage Area D, the earthen area, is small, 10 ft X 30 ft. This area never held more than three drums of a waste material. As described on Pages 7 and 8 of the Closure Plan, samples will be taken at soil depths 0-6 inches, 6-12 inches, and 12-18 inches at three points. Three locations for these samples were specified in the

Closure Plan. These locations will be along the center line of the area, at 5 ft, 15 ft, and 25 ft from the edge.

c. Background Samples - Background samples for the soil sampling was proposed at two sites at the same three depths as proposed for the soil samples, See Page 8 of Closure Plan.

d. Sampling Methods and Equipment - See Page 8 for the method and equipment to be used for the soil samples. The Oakfield Soil Sampler is in accordance with SW 846, Part 1.2.1.5 (Second Edition). As indicated in the Closure Plan, if the soil is too granular for the sampling trier, a trowel and shovel will be utilized, in accordance with SW 846 Part 1.2.1.7 (Second Edition).

Sampling of the individual wash waters will be with a composite liquid waste sampler (Coliwasa), in accordance to SW 846, Part 1.2.1.1.

e. Analytical Methods - Analytical work will be performed by an outside contract laboratory, in accordance to the procedures outlined in SW 846, except where noted below. Specifically, the following procedures will be utilized:

	Method Number
Cyanide, total	9010
Chromium, total	7090,7091
Copper, total	Lab Discretion
Nickel, total	7520,7521
Zinc, total	Lab Discretion
Cadmium, total	7130,7131
Total Halogenated Organics	9020
Phenols	EPA Method 420.1

The 4-Aminoantipyrine test, in accordance with U.S. EPA's Manual of "Methods for Chemical Analysis of Water and Wastes" (Storet No. 32730) will be used to analyze for the family of phenolic compounds. This method was chosen because naphtha solvent, which was stored in Area C, contains phenolic compounds. This procedure will determine the presence or absence of all phenolics, and is therefore more informative than the specific test method for just phenol in SW 846.

f. Evidence of a Quality Assurance/Quality Control Planfor Laboratory Analyses - Barber-Colman proposes to use an outside contract laboratory for the analytical work. We will ask for a statement from the selected laboratory, certifying that they have a quality assurance/ quality control plan. This letter will accompany the Closure Document Report.

g. A Clear Statement of the Proposed "Clean" Level for Soil
This was clearly stated on Pages 7 and 8 of the Closure Plan.

SOIL SAMPLING AND ANALYSIS PLAN

The Agency states that grid intervals of 25 - 100 ft are common. Barber-Colman's Closure Plan called for a 10-ft grid interval, or 3 samples equally spaced down the center of a 10-ft X 30-ft area. We believe three samples is sufficient to determine if the area is contaminated, and is more restrictive than "commonly" approved by the IEPA.

The depth of sampling proposed is sufficient for metal contamination. Metals tend to remain near the surface because of the ion exchange capacity of the soil. If the metals are not found in the top 18 inches, they will not be present at lower depths either.

ITEM 6. PROPOSAL OF CLEAN-UP LEVELS FOR SOILS

The only soil sampling proposed is in the 10-ft X 30-ft Storage Area D. If the wash water from cleaning Storage Area A, B, or C exceeds the clean levels specified in the Plan by a factor of ten, then further testing/cleaning outside the specific drum storage area will be undertaken.

The Agency's letter specifically states that background samples are needed when the hazardous waste constituents of interest naturally occur in soil, such as heavy metals. Yet, the Agency ignores this and "recommends" guidelines for heavy metals that are ridiculously low, especially for cadmium and copper, with any consideration of the natural background levels. The levels "recommended" by the Agency for cadmium and copper are below the detection level generally reported by laboratories (0.1 mg/l). These levels can be exceeded in natural soils, where the soils pH is not adequately buffered to prevent the solubilizing of the metals when contacted with the acetic acid used in the EP toxicity test.

In light of the Agency's preference for EP metals versus total metals, the proposed testing has been changed in the amended Closure Plan.

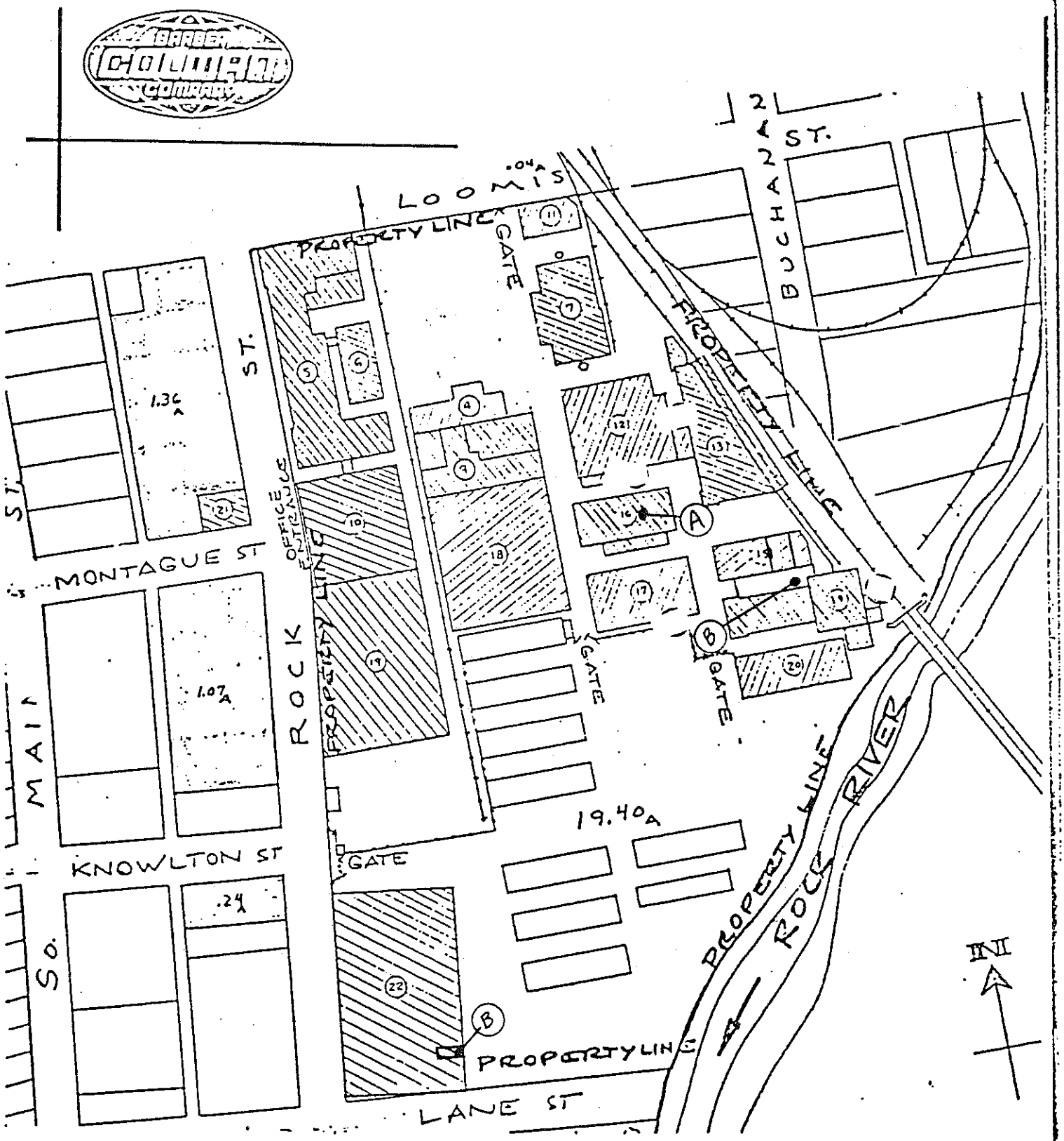
7. STATEMENT OF FACILITY STATUS AFTER CLOSURE

This was clearly stated on ATTACHMENT I of the Closure Plan. Barber-Colman's Rock Street facility intends to operate after closure as a generator of more than 1,000 kg/mo with storage for less than 90 days.

8. DOES THE WASHWATER MEET THE SANITARY DISTRICT'S REQUIREMENTS AFTER TREATMENT -

Yes. Barber-Colman operates a large plating facility, and associated wastewater pretreatment system. Barber-Colman discharges approximately 150,000 gallons per day to the Sanitary District. The total volume of washwater, less than 200 gallons, can readily be treated with such a large system.

V. FACILITY DRAWING (see page 4)



(A) HEAT TREATING - 9,460 SQ. FT.

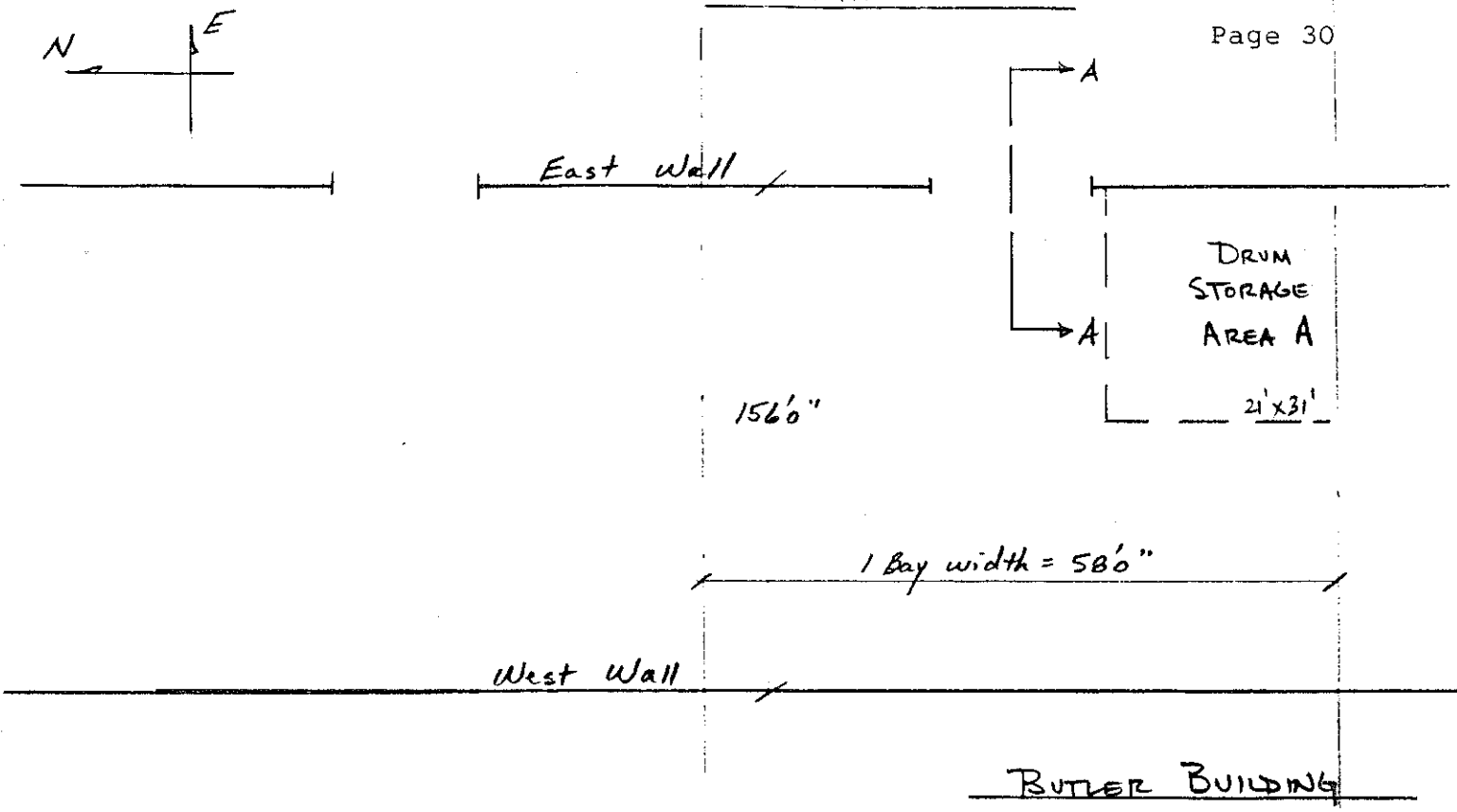
(B) ELECTROPLATING - 22,450 SQ. FT.

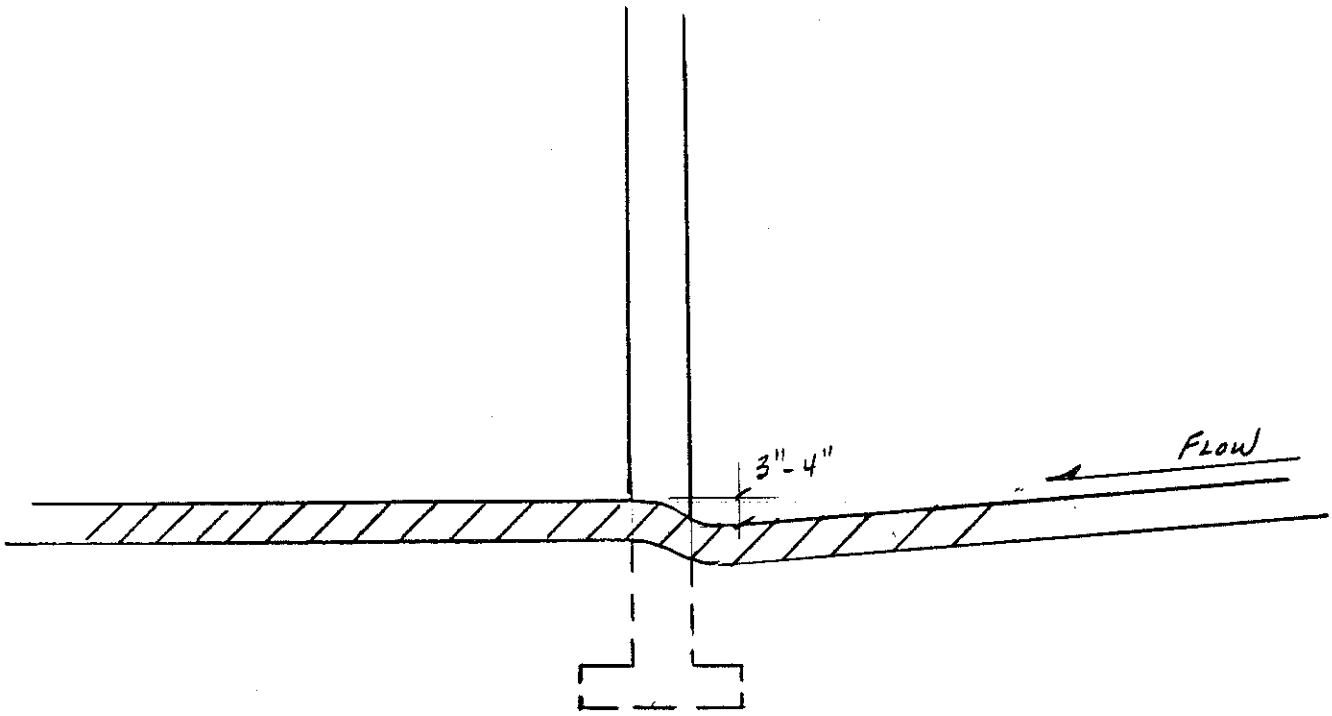
ROCK STREET PLANT

SCALE 1"=200'

Barber-Colman Company

1300 Rock Street, Rockford, Illinois U.S.A. 61101 Phone: 815/968-6833 Teletype: 815/962-2420 Telex: 25-7413 Cable: BARCOL


N
E
East Wall
A
A
DRUM
STORAGE
AREA A
156'0"
21'x31'
1 Bay width = 58'0"
West Wall
BUTLER BUILDING


3"-4"
FLOW

SECTION A-A

CLOSURE PLAN

Name of Site: Barber-Colman Company - Rock Street Plant

Site Location: 1300 Rock Street

Street, R.R. # or P.O. Box 1300 Rock Street

City Rockford State IL Zip Code 61101

Name of Owner: Barber-Colman Company

Address: 555 Colman Center Drive

Street. R.R. # or P. O. Box P.O. Box 7040

City Rockford State IL Zip Code 61101

Contact Name: Rod Johnson

phone number (815) 397-7400

USEPA I.D. No. ILD005145958 IEPA Site No. 2010300054

Closure shall be: ☒ Complete ☐ Partial (check one)

1. Attach the Part A for this facility and a map diagram or picture showing the facility lay-out and the area(s) to be closed.
2. State the reason of closure.

(See Attachment 1)

3. Provide an estimate of the maximum inventory of waste in storage during the life of the facility. Include a list of hazardous wastes, their codes, and amount in storage at the time of closure.

(See Attachment 2)

4. Provide a schedule of closure that briefly describes how and when the facility will be closed.

(See Attachment 3)

5. Describe the steps taken at the time of closure to remove hazardous waste residues from the tank(s), its' discharge control equipment and discharge confinement structures.

Not Applicable - No Tanks Invloved

6. Describe the steps taken to remove containers, liners, base and soil containing or contaminated with hazardous waste.

(See Attachment 4)

Certification: The undersigned hereby makes an application for a Closure Plan approval and certifies that the information referenced herein is true, correct and current.

Signature of Operator

Laurens C. Petersen
Name

Barber-Colman Company
Address 1300 Rock Street
Rockford, IL 61105

Signature of Owner

John Mink, Vice President Corp. Mfg.
Name

Barber-Colman Company
Address 555 Colman Center drive
Rockford, IL 61125

BARBER-COLMAN COMPANY - ROCK STREET PLANT

- CLOSURE PLAN -

ATTACHMENT 1

2. Reason for Closure

Barber-Colman originally filed as a treater and storer of hazardous waste. Several significant events have occurred since this original submittal that negate the need for Barber-Colman to remain a "TSD" facility.

First, in July, 1984, the entire facilities at Rock Street were sold to Reed-Chatwood, Inc. Barber-Colman continues to lease space from Reed Chatwood, including the designated drum storage areas. The modified Part A Application reflects the hazardous waste activities conducted by Barber-Colman.

Barber-Colman (B-C) originally filed as a "treatment" facility because of the wastewater pretreatment facilities for electroplating wastes. Treatment of wastewater in tanks was exempted from RCRA regulations since Barber-Colman's original submittal, and therefore this treatment status is no longer necessary. B-C also identified a 3,000 gallon underground tank for storage of hazardous waste. This tank has never stored hazardous waste, holding used oils which have been tested to be non-hazardous. This tank is currently owned by Reed-Chatwood and is still used for the storage of non-hazardous used oils. Therefore this tank has been excluded in B-C's modified Part A Application.

Barber-Colman has operated four drum storage areas over the past seven years, which are the subject of this Closure Plan. Once Closure of all four areas is completed, B-C intends to consolidate drum accumulation in two designated areas, and move the wastes every 90 days. Thus, the reason for closure is to reduce Barber-Colman's status to "Generator Only." Barber-Colman will generate and store more than 1,000 kg/month for less than 90 days.

BARBER-COLMAN COMPANY - ROCK STREET PLANT

- CLOSURE PLAN -

ATTACHMENT 2

3. Maximum Inventory of Waste During Life of the Facility

a) Storage Area A - Butler Building
Asphalt Floor 21' x 31' ; Topography = flat/ USC = 6 yrs.

Description	Maximum Storage, gallons	Waste at Time of Closure, gallons	Waste Code
Copper Cyanide	440	110	F007
Cyanide Heat Treat Salts	165	110	D003
Chromic Acid	165	165	D007
Production Line Clean-up	220	220	D007/ D006
1,1,1-Trichloroethane	825	550	F001
Nickel Filters	440	440	Non-Hazardous
Zinc Filters	880	880	Non-Hazardous
Soak Cleaners Sludges	440	440	F008

From Part A application - 3,575 gallons capacity (S01) from line #1, page 1 of 5.

b) Storage Area B - Cold Storage Area (Lean-to)
Concrete Floor - Area - 28' x 112' ; Topography = Flat
Use = 7 yrs.

Description	Maximum Storage, gallons	Waste at Time of Closure, gallons	Waste Code
Copper Cyanide	440	0	F007
Cyanide Heat Treat Salts	165	0	D003
Chromic Acid	165	0	D007
Nickel Filters	440	0	Non-Hazardous
Zinc Filters	880	0	Non-Hazardous
Soak Cleaners Sludges	440	0	F008

From Part A application - 17,200 gallons capacity (S01), from line #2, page 1 of 5

c) Storage Area C - Carpenters' Shed
(Concrete Floor); Topography = Flat ; Use = 3 yrs.
Six Storage Bins, each 9' x 19'
plus Aisle Area 15' x 36'

Description	Maximum Storage, gallons	Waste at Time of Closure, gallons	Waste Code
Wax, Naphtha Contaminated	825	825	D001
Nickel Filters	220	0	Non-Hazardous
Zinc Filters	220	0	Non-Hazardous
Copper Strip Solution	880	0	Non-Hazardous

From Part A application - 8,500 gallons capacity (S01), from line #3, page 1 of 5

d) Section 17 - Outside Earthen Area- Crushed sand, gravel, earth- 10' x 30' - Topography = Flat; Use = 60 days.

Description	Maximum Storage, gallons	Waste at Time of Closure, gallons	Waste Code
Wastewater Treatment Sludge (Chrome Reduction, Zinc and Nickel Precipitation)	165	0	F006

From Part A application - 1,650 gallons capacity (S01), from line #4, page 1 of 5.

Revised 2/9/87

BARBER-COLMAN COMPANY - ROCK STREET PLANT

- CLOSURE PLAN -

ATTACHMENT 3

4. Schedule of Closure

Date	Item
November 1, 1986	Closure Plan to IEPA
April 1, 1987	Approval of Plan by IEPA
May 1, 1987	Removal of all drums of hazardous waste
June 1, 1987	Decontamination of concrete and asphalt storage areas
June 7, 1987	Testing of the four drum storage areas for contamination
July 1, 1987	Laboratory test results received. Areas rescrubbed, if necessary, and soil removed, if contaminated
August 1, 1987	Final certification of closure by Barber-Colman and Independent Professional Engineer submitted to IEPA

6. Steps taken to remove containers, liners, base and soil containing or contaminated with hazardous waste.

There are four drum storage areas involved in this closure, each is discussed below:

A. Storage Area A - Butler Building - Asphalt Floor 21' x 31'

This building is the storage site for hazardous waste from three separate companies. Barber-Colman, Reed-Chatwood, and Great Lakes Circuit Board Printers. Barber-Colman occupies a 21 ft x 31 ft area, where cyanide solutions, 1,1,1-trichloroethane, chromic acid, nickel filters, and zinc filters have been stored. The following procedure will be utilized to close out this area:

1. All drums will be removed from the area and disposed of through Barber-Colman's established disposal routes (e.g., cyanides and chromicacid go to Nelson Industrial Disposal, 1,1,1-trichloroethane goes to Hydrite Chemical for recycling, and nickel and zinc filters to BFI in Winthrop Harbor).

2. The area will be broom-cleaned with the floor sweepings placed in one of the containers of non-liquid hazardous waste.

3. The area will be scrubbed manually with brushes and a mild detergent. A wet-vac will be used to collect the wash water. The wash water will be placed in a plastic lined 55-gallon drum.

4. The wash water will be tested for the following pollutants. If any analyses exceed the action level, the area will be rescrubbed.

Parameter	Action Level, mg/l
Cyanide, total	1.0
Chromium, total	1.0
Copper, total	1.0
Nickel	1.0
Zinc	1.0
Cadmium	0.15
Total Halogenated Organics (TOX)	2.13

The wash water will be treated through Barber-Colman's pretreatment facility, which includes chromium reduction, neutralization and metal precipitation, prior to discharge to the Sanitary District of Rockford.

5. If the wash water exceeded any of the above levels, steps 3 and 4 will be repeated, with testing limited to those parameters initially exceeding the action levels.

B. Storage Area B - Cold Storage Area (Lean-to) - Concrete Floor, 28' x 112'

This area stored the same types of waste as Area A, except no chlorinated solvent material was stored here. The identical procedure as outlined under A will be followed, except no analysis of TOX will be taken.

C. Storage Area C - Carpenters' Shed - Concrete Floor, Six Storage Bins, each 9' x 19' plus aisle area of 15' x 36'

This area stored nickel and zinc filters, a copper stripping solution, and a spent wax/naphtha mixture. This area will be scrubbed just as described in "A", and tested for copper, zinc, and nickel, with the same "action" levels. The 4-aminoantipyrine test for phenol will be run for the presence of phenolic compounds from the naphtha solvent. An action level of 14.4 mg/l phenols (see June 13, 1986 Federal Register) will be used to determine if the concrete areas are clean.

D. Storage Area D - Section 17 - Outside Earthen Area 10' x 30'

This area was utilized on a very limited basis, holding no more than three drums of an electroplating sludge (F006). The

primary component(s) in this sludge were chromium, nickel and zinc. Soil samples will be collected at three points along the center line of the length of the earthen area. Soil samples will be taken at depths of 0-6, 6-12, and 12-18 inches at points 5 ft, 15 ft, and 25 ft from one side. Each test sample will be analyzed for EP chromium, EP nickel, and EP zinc. If the test samples are below 1.0 mg/l of each of these three parameters, the area will be deemed "clean," and no further action will be taken. If any soil sample(s) exceeds the 1.0 mg/l level for any metal, then four additional test samples and four control samples will be collected. If any of these new test samples exceed the mean level from the control sites by more than one standard deviation and exceed 1.0 mg/l of that metal,then this soil will bedeemed contaminated, and removed as an F006 hazardous waste.

E. Sampling Procedures

Soil samples will be collected using an Oakfield Soil Sampler, to the extent possible. A trowel and shovel will be used to the extent necessary if the Oakfield Soil Sampler cannot reach 24 inches due to rocks or other material that can't be penetrated. The samples will be placed in sample jars, sealed with tape, and shipped to a contract laboratory on ice. Chain-of-custody procedures will be followed. Between each sampling, the Oakfield Soil Sampler, shovel and trowel will be cleaned with detergent, rinsed with tap water, and rinsed with de-ionized water. The wash water and rinse water will be discharged to Barber-Colman's pretreatment facility.

An independent, registered Professional Engineer will perform the actual sampling described in this section, and upon completion of the closure will certify the closure in accordance with the approved Closure Plan.

REVISION RECORD

1-9-87 Revision 1-

a.) Amended part A. Permit page 3 of 5; item #2 from D002 to F008; item #7 from P030 to D003.
b.) Page 2 and page 3 of report; cyanide Heat Treat Salts from P030 to D003 and Soak Cleaner Sludges from D002 to F008.

2-9-87 Revision 2-Response to IEPA letter of 1-14-87-

a.) Attachment 1, pg. 1 - added last sentence - item #7.

b.) Attachment 2, pg. 2,3,&4 - further description -item #2.

c.) Attahcment 3, pg. 5 - revised closure schedule.

d.) Attachment 4, pg. 6 - added statement for production line clean-up and soak cleaner sludges.
e.) Attachment 4, pg. 8 - further description of soil sampling - item #5.

Fill-in areas are spaced for elite type, i.e., 12 characters/inch.

FORM 1 GENERAL — U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F I L D 0 0 5 1 4 5 9 5 8

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all Items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X" YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is ONE of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X

III. NAME OF FACILITY

SKIP: BARBER-COLMAN COMPANY, ROCK STREET PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title): PETERSEN, LAURENS, MANAGER

B. PHONE (area code & no.): 815 968 0660

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 1300 ROCK STREET

B. CITY OR TOWN: ROCKORD

C. STATE: IL

D. ZIP CODE: 61101

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 1300 ROCK STREET

B. COUNTY NAME: WINNEBAGO

C. CITY OR TOWN: ROCKFORD

D. STATE: IL

E. ZIP CODE: 61101

CONTINUE ON REVERSE

EPA Form 3510-1 (6-80)

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

	A. FIRST	B. SECOND
	3471 (specify) ELECTROPLATING	3398 (specify) METAL HEAT TREATING
	C. THIRD	D. FOURTH
	(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: BARBER-COLMAN COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 815 968 6833

E. STREET OR P.O. BOX: 1300 ROCK STREET

F. CITY OR TOWN: ROCKFORD

G. STATE: IL

H. ZIP CODE: 61101

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☐ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	9 N	IL0003301	
B. UIC (Underground Injection of Fluids)	9 U		
C. RCRA (Hazardous Wastes)	3		
D. PSD (Air Emissions from Proposed Sources)	9 P		
E. OTHER (specify)	9	7303084 4	(specify) HEAT TREATING, IL AIR POLLUTION
E. OTHER (specify)	9	7303084 7	(specify) PLATING AREA, IL AIR POLLUTION

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Metal Finishing, manufacture environmental controls, industrial instruments and aircraft products, all related to electronic components.

Also provide contract plating and heat treating.

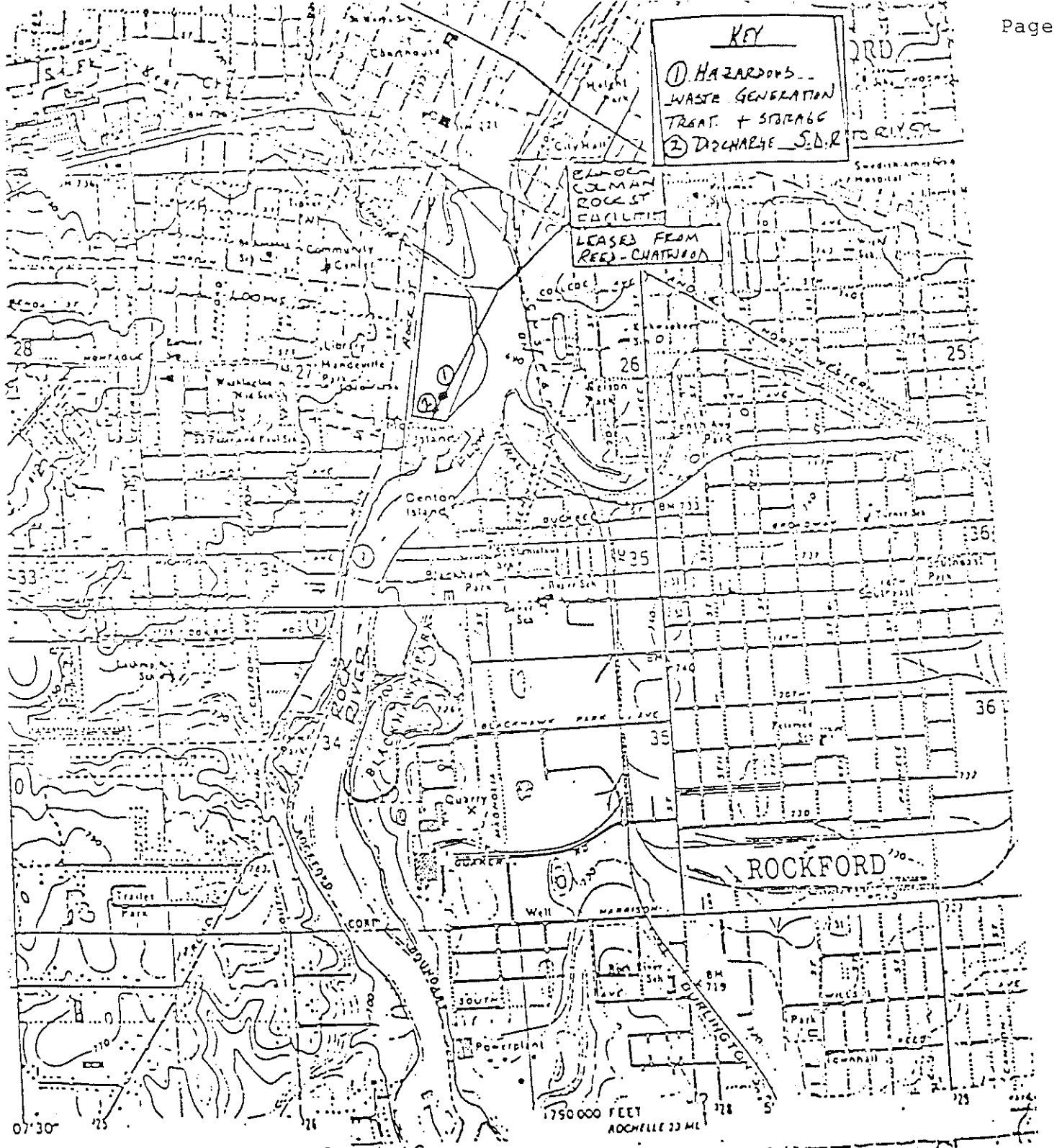
XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Laurens C. Petersen Mgr. Colman Metal Finishing	Laurens C Petersen	1/7/87

COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-1 (6-80) REVERSE



Mapped, edited, and published by the Geological Survey

ROCKFORD NORTH, ILL.

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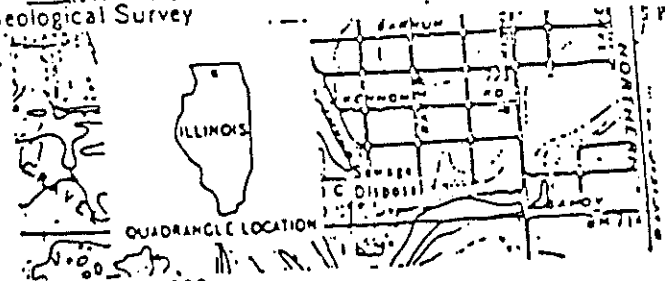

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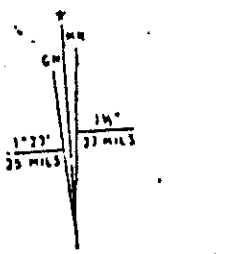
1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 KILOMETER

CONTOUR INTERVAL 10 FEET

DOTTED LINES REPRESENT 5-FOOT CONTOURS



Please print or type in the unshaded areas only.
(Elite type: 12 characters per inch)

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I L D 0 0 5 1 4 5 9 5 8 | | 1

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APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

- [ ] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*
- [ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

- [X] 1. FACILITY HAS INTERIM STATUS
- [ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
ECTION WELL	D79	GALLONS OR LITERS
NDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C: DUP | | 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	3,575 (A)	G		7				
2	S 0 1	17,200 (B)	G		8				
3	S 0 1	8,580 (C)	G		9				
4	S 0 1	1,650 (D)	G		10				

ontinued from the front.

II. PROCESSES *(continued)*

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Form Approved OMB No. 158-S

d from page 2.
hotocopy this page before completing if you have more than 26 wastes to list.

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	DUP		DUP

'A I.D. NUMBER (enter from page 1)

L D 0 0 5 1 4 5 9 5 8

ESCRIPTION OF HAZARDOUS WASTES (continued)

A. HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1 D 0 0 6	1	T	S 0 1	
2 F 0 0 8	2	T	S 0 1	
3 D 0 0 7	1	T	S 0 1	
4 F 0 0 1	3	T	S 0 1	
5 F 0 0 7	2	T	S 0 1	
6 D 0 0 1	4	T	S 0 1	
7 D 0 0 3	1	T	S 0 1	
8 F 0 0 6	240	T	S 0 1	Never been stored in the 4 designated storage areas, always remove every 90 days or less
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				

CONTINUE ON REVERSE

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

I	L	D	0	0	5	1	4	5	9	5	8	T/A/C	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
4	2	1	5	0	3	2	0	8	9	0	5	0	5	3

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	G		

IX. OWNER CERTIFICATION

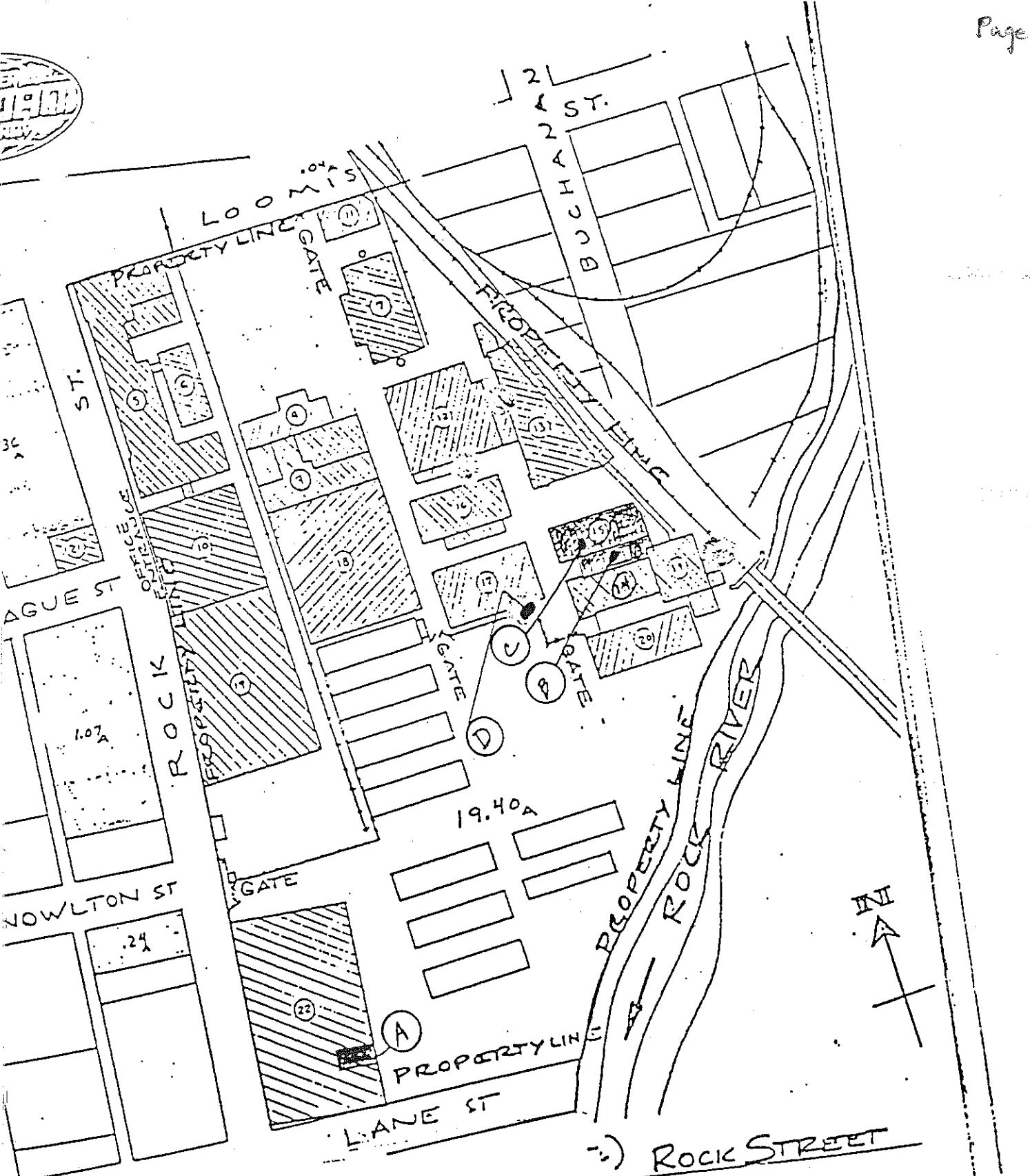
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John Mink, Vice President	John W. Mink	1/7/87

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John Mink, Vice President	John W. Mink	4/7/87



BARREL STORAGE

- BUTLER BLDG. - SECT. 22 - 21' x 31' = 651' (Attachment A)
- CO STOR. AREA - SECT. 14 - 28' x 112' = 3136 (Attachment B)
- CARP. SHED - SECT 15 - VARIOUS - TOT 1566 (Attachment B)
- EARTHEN AREA - (10' x 30') - SOUTH OF SECT. 17

ROCK STREET PLANT

SCALE 1" = 200'

Form Approved OMB No 2050 0028 Expires 9 30 88
GSA No 0246 EPA IDT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*)

F Official Use Only

Comments

C C

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
C F	T/A C 1	

I. Name of Installation

BARBER COLMAN METAL FINISHING

II. Installation Mailing Address

Street or P.O. Box

C 3 P.O. BOX 2940

City or Town	State	ZIP Code
C 4 ROCKFORD	IL	61132

III. Location of Installation

Street or Route Number

C 5 1300 ROCK STREET

City or Town	State	ZIP Code
C 6 ROCKFORD	IL	61101

IV. Installation Contact

Name and Title (*last, first, and job title*)	Phone Number (*area code and number*)
C 2 KIRIT PATEL, CHEMIST	815 968 0660

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership (*enter code*)
C R BARBER COLMAN COMPANY	P

VI. Type of Regulated Waste Activity (*Mark 'X' in the appropriate boxes. Refer to instructions.*)

A. Hazardous Waste Activity	B. Used Oil Fuel Activities
☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.	☐ 6. Off-Specification Used Oil Fuel (*enter 'X' and mark appropriate boxes below*)
☐ 2. Transporter	☐ a. Generator Marketing to Burner
☒ 3. Treater/Storer/Disposer	☐ b. Other Marketer
☐ 4. Underground Injection	☐ c. Burner
☐ 5. Market or Burn Hazardous Waste Fuel (*enter 'X' and mark appropriate boxes below*)	☐ 7. Specification Used Oil Fuel Marketer (*or On site Burner*) Who First Claims the Oil Meets the Specification
☐ a. Generator Marketing to Burner	
☐ b. Other Marketer	
☐ c. Burner	

VII. Waste Fuel Burning: Type of Combustion Device (*enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.*)

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (*transporters only — enter 'X' in the appropriate box(es)*)

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (*specify*)

First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

	C. Installation's EPA ID Number
☐ A. First Notification ☒ B. Subsequent Notification (*complete item C*)	ILD005145958

ID — For Official Use Only

C														T/A	C
W															1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 6	F 0 0 7	F 0 0 8		
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- ☒ 1. Ignitable *(D001)*
- ☐ 2. Corrosive *(D002)*
- ☒ 3. Reactive *(D003)*
- ☒ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Laurens C. Petersen	Laurens C. Petersen Mgr. Colman Metal Finishing	1/7/87

Section 7: Description of steps involved in Closure Plan Implementation (refer to Section 6, Attachment 4, pages 38-40).

Attachment 4:
6.) Steps taken to remove containers, base and soil contaminated with Hazardous Waste per approved Closure Plan:

Because container storage areas A, B and C underwent similar washwater treatment, they will be addressed as a group in handling steps 1-5 (refer to pages 38-39).

A.) Storage Area A - 21' x 31' - Butler Building (asphalt surface).

B.) Storage Area B - 15' x 112' (refer to section 3, page 8, modification Log#C-283-M-1) Cold Storage Area (Lean-to) - concrete floor.

C.) Storage Area C - Carpenter's Shed-6 storage areas 9'x 19' plus aisle space 15' x 36' - all concrete floor.

(1) All drummed Hazardous Waste in storage areas A, B, and C was disposed of using our regular licensed transporters and disposal sites. TABLE M-1 (section 11, pages 99-100) lists all manifests, waste descriptions, volume, transporter and disposal site from 4/1/87 through 1/29/88.

(2) Prior to each scrubbing, rinsing and wet vacuuming, each area, A, B and C was thoroughly broom swept. Sweepings collected in each area were deposited into a 55-gallon drum of solid waste in that respective area.

(3) Areas A, B and C were first washed on 6/20/87; P.O. #162038-07 was issued to S.M.S. (Surface Maintenance Systems). Each wash area was defined by using existing building walls for 1, 2 or 3 sides of each rectangular area; the remaining 1, 2 or 3 sides were established by attaching a 1/2" dia. x 100' long yellow polyethylene rope at fixed corners and securing it around empty 55-gallon, 10-mil plastic lined drums which were used to collect the washwater. Refer to Section 8, page 61 for a drawing showing areas A, B and C roped off.

Each area was thoroughly scrubbed using a 30" diameter, electric powered, rotary floor scrubber to work a generous amount of Tri-Sodium Phosphate soap and large amount of city water into each floor surface. The 30" scrubber was renewed each time a new area was washed.

Most of the soapy washwater was wet vacuumed (using clean, portable electric - power vacuums) into clean containers. These containers were emptied into the lined 55-gallon wash drums. The floor was then rinsed with a large amount of city water. This rinsewater was then collected in plastic lined drums designated as rinsewater drums.

(4) Washwater samples were obtained using a 4' x 1/2" length of clean E.M.T. steel conduit. The conduit was placed vertically into the last rinsewater drum. Suction was established by placing a thumb over the upper conduit opening. As the conduit was withdrawn from the liquid, suction was released by taking the thumb off the opening and a representative sample was dispensed into each sample container. Each area was sampled with a separate, clean conduit.

Washwater action levels in mg/l for the 8 hazardous parameters are listed on page 39. The first 7 parameters are requirements of Areas A, B and C. The test for phenols is only required in Area C (wax/naptha stored). These action levels are also found in column 1 of TABLE-WW1 (section 8, page 60).

All washwater samples were collected in sample jars provided by Aqualab, Inc., 3548 - 35th Street, Rockford, IL 61109. Each collection jar was specifically treated to preserve the test being run:

a) Metals - Cadmium, Chromium, Copper, Nickel and Zinc - 1 plastic jar preserved with HNO_3.
b) Cyanide - 1 plastic jar; NaOH.
c) T.O.X. - 1 amber glass jar.
d) 1,1,1 - Trichlorethane - 2 small glass vials; no air in sample.
e) Phenol - 1 glass jar; H_2SO_4.

Using this format, each wash could require 5 jars (areas A&B) and 6 jars (area C).

As required by Section 6, Item 5-f, page 19, evidence of quality assurance by our contract laboratory, Aqualab, is found in Section 8, Pages 62-67.

During the 1st wash, 2 drums, 1 soapy and 1 rinse, were filled at area A. Five samples were obtained, given Barber-Colman sample #A2, assigned Aqualab sample #47448 and analyzed for the 7 required parameters on P.O.#162115-07. Similarly, 7 drums, 5 soapy and 2 rinse, were filled at Area B. Five samples given B.C. #B2, Aqualab sample #47449 and covered by P.O. #162115-07 were analyzed for the same 7 parameters. Two drums, 1 soapy and 1 rinse, were filled at area C. Six samples given B.C. #C2, Aqualab #47450, and covered by P.O. #162115-07 were analyzed for 8 parameters.

The 11 drums of washwater collected were metered through Barber Colman's Waste Water Treatment System at this 1300 Rock Street Facility by 7/15/87.

(5) With reference to TABLE WWI (Section 8, Page 60), analytical results of 7/17/87 showed Nickel and Zinc exceeding action levels in Area A; Cadmium, Chrome, Copper, Nickel and Zinc exceeding action levels in Area B; and Chromium and Zinc exceeding action levels in Area C. Nickel's 1.00 mg/l value (Area C) was neither above nor below; we chose to continue testing. Cyanide, Phenol, 1,1,1 Trichlorethane and T.O.X. results in each area tested well below action levels; no further testing of these parameters was required.

Areas A, B and C were thoroughly cleaned a second time on 7/2/87. One sample jar was necessary at each location because metals were the only tests required. Labor by S.M.S. was charged against the original P.O. #162038-07. P.O. #162203-07 was issued to Aqualab. Two drums were filled at A, 4 at B and 2 at C. With reference to TABLE WWI (Section 8, Page 60), Barber-Colman sample numbers were A3, B3 and C3; corresponding Aqualab sample #'s were 47642, 47643 and 47644. The results were unexpectedly high in Areas A and C. Also, the Copper, Nickel and Zinc results in Area B were high. The cleaning procedure followed was identical to the first cleaning.

Investigation revealed that the 55-gallon collection drums, formerly used in the plating department, and the 10-mil plastic drum liners, also previously used, had not been rinsed thoroughly enough. As a result, trace amounts of plating chemicals contributed to the high numbers. New 55-gallon collection drums will be fitted with new 10-mil plastic liners for future washings. The eight washwater drums were metered through the onsite waste water treatment facility 7-30-87.

The third washing of Areas A, B and C was done 8/29-87. During the period between receiving the results of the 2nd washing (7/17/87) and 8/29/87, investigation into the cause of continued high chromium values in Area B was made. Significant cracks in the 6" thick concrete floor at the west end and at the east end of the 15' wide x 112' long area appeared to retain previously spilled chemical residues which when washed, vacuumed and analyzed were significant enough to keep us above the plan action level. Also, shallow pockets in isolated locations throughout the floor area appeared to retain small amounts of chemicals. It was decided to divide Area B into 3 pieces (West end 15' x 15', center section 15' x 82' and East end 15' x 15'). Treatment of the West end and the East end is addressed in Section 2, Pages 4-7 and later in this report; treatment of the center section follows.

On 8/29/87, Areas A and C were washed as before. East and West ends of Area B were not washed. Before washing the 15' x 82' Area B center section, 3/8" of the concrete surface was ground off the entire surface using a scarifier. This area was thoroughly broom swept; sweepings were placed into a drum of solid hazardous waste awaiting disposal. The area was then soap washed and rinsed as before. Test results are found in TABLE WWI. Area A again exceeded action levels, Area B tested clean and Area C showed improvement. Eight partial drums of washwater used were metered through the Waste Water Treatment System 9/10/87.

A fourth wash on 9/8/87 was done in Areas A and C. Results in TABLE WWI show improvement in Area A but still over 1.00 for Nickel and Zinc; and lower than plan action levels for Chromium, Nickel, and Zinc in Area C; Area C now considered clean.

A fifth wash of Area A was done on 9/21/87. Zinc and Nickel totals of 0.378 mg/l and 0.310 mg/l were recorded to complete our Area A, B and C washwater cleanup.

D.) Storage Area D - Outside Earthen Area - 10' x 30'

On 4/27/87, Jim Huff, our registered professional Engineer on the job and Rod Johnson obtained soil samples per the Closure Plan (Section 6, Attachment 4-D, Page 40).

The 10'x 30' area was defined using the chain link fence as the 30' south side and locating N-E and N-W corners with orange spray paint. The sample point coordinates at (East end)
5', 5'; (center) 5, 15' and (West end) 5', 25' were marked with orange spray paint (Refer to drawing Section 9, page 74).

Samples were obtained by digging to the required depth using a garden shovel and hand shovel, if needed. Each sample was obtained using an Oakfield Sampler. Each sample was placed into a small glass vial provided by C.B.C. Aquasearch, the contract laboratory on soil samples Area D. Each sample was properly identified, placed on ice and chain of custody procedures followed.

After obtaining each sample, the shovels and sampler were washed in soapy water (Tri-sodium phosphate), rinsed in clear water, and sprayed with De ionized water to decontaminate them. Soapy and clear water were metered through the waste water treatment system onsite.

Three samples were obtained at 0"-6", 6"-12", and 12"-18" at the East end (5', 5' location); Chromium, Nickel and Zinc in each sample were well below the plan action level of 1.0 mg/l E.P. toxicity; (See section 9, pages 75-77).

Three samples were obtained at 0"-6", 6"-12", and 12"-18" at the center (5', 15' location); Chromium, Nickel and Zinc in each sample tested well below the 1.0 mg/l E.P. Toxicity; (See Section 9, Pages 78-80).

One sample was obtained at the 0"-6" depth from the west end (5', 25' location); Chrome and Nickel passed but Zinc was 1.2 mg/l E.P. Toxicity. (See Section 9, page 81). A second sample; 0"-6" on 5/20/87 tested 2.6 mg/l E.P. Toxicity (See Section 9, page 82). Samples were not obtained at 6"-12" and 12"-18" from the west end (5', 25' location) because our shovels could not penetrate the asphalt surface. The sample obtained at 0"-6" was obtained at a shallow break in the surface.

No control samples were taken. Rather we removed the soil to a 2' depth approximately 10' east and west of the 5', 25' sample location and 12' out from the fence (see drawing, Section 9, Page 74). This soil was placed in a 20 cubic yard Browning Ferris Industries rolloff box and is permitted as non-hazardous special waste to B.F.I.'s Rockford landfill. The permit # is _____. This was transported on Manifest #IL-1212209 (see TABLE M-1, Section 11, page 100).

Before backfilling a soil sample was taken at the 2' depth and taken to Aqualab on P.O. #163169-07. E.P. Toxicity tests for Chromium (0.001), Nickel (0.01) and Zinc 0.477 are well below the 1.0 mg/l plan action levels (see Section 9, Page 85).

This completes Closure activities required under the original approval Log #C-283M of 3/17/87 and also addendum 1, Log #C-283M-1 of 4/14/87.

Addendum 2: Log #C-183M-2; Description of Closure activities to implement extension requested 9-23-87 (Section 2, Pages 4-7) and approval of 10-8-87 (Section 1, Pages 1-3).

On 9/9/87, the 15' x 15' x 6" concrete floor slabs on East and West ends of storage Area B (reference Section 2, Page 6), were jackhammered into liftable pieces and loaded into 2-12 cubic yard B.F.I. rolloff containers placed onsite. J.W. Ericson Construction did this work on P.O. #162532-07.

A (R.C.R.A.) hazardous waste analysis was done on a concrete sample taken to Aqualab; P.O. #162539-07. Results available on 9/29/87; Aqualab sample #48836, showed this material to be hazardous for Chromium D-007 (Section 10, Page 87). A permit application was submitted to the I.E.P.A. through B.F.I. for landfill at their Waukegan, Illinois site. This permit #870752 (Section 10, Pages 96-97) was approved 11/12/87. The two 12 yard rolloffs were manifested on #IL-1212241 and #IL-1212242 on 12/10/87 and 12/11/87 (Section 11, Pages 101 and 102).

After concrete removal and prior to any soil removal, five soil samples at various locations and depths within the west and east ends of Area B were taken and described as follows:

1 - #1B - West 12" deep - Aqualab #48834 - 9/10
2 - #2B - 4' West - 12" deep - Aqualab #48835 - 9/10
3 - #2BE - East end of West Area 18" - Aqualab #48908 - 9/11
4 - #1NW - West End 30" deep - Aqualab #48935 - 9/15
Aqualab #49393 - 10/26
5 - #3E - East end - 30" - Aqualab #48934 - 9/15

Samples #1B and #2B were analyzed by Aqualab on P.O. #162539-07; sample #2BE on P.O. #162545-07; and #1-NW and #3E were analyzed on P.O. #162603-07. A (R.C.R.A.) hazardous waste analysis was done on each. Results of these tests, available on 10/2/87, are found in TABLE S-1 (Section 10, Page 86).

On 9/30/87, J.W. Ericson Construction on P.O. #162650-07, removed the earth in the East and West ends (approximately 15' x 15' x 30" deep) and deposited this waste into (6)-20 cubic yard B.F.I. rolloff boxes placed onsite. A permit application was submitted to the I.E.P.A. through B.F.I. for landfill at their Rockford site (the soil is non-hazardous per R.C.R.A.). This permit #870751 (Section 10, Page 98) was approved 11/23/87. The 6 - 20 yard rolloffs were manifested on #IL-1212243 through #IL-1212248 and transported to B.F.I.'s landfill during the week of 12/10/87 through 12/12/87 (Section 11, Pages 103-108).

Before backfilling the excavated holes and pouring a new concrete floor, samples were obtained at east end (30" deep) and west end (30" deep). These samples obtained on 10/1/87 were analyzed by Aqualab on P.O. #162646-07 specifically for Chromium, Nickel, Zinc, Copper and Cyanide (E.P. Toxicity action levels per extension approval 10/8/87 - Section 1,

Page 2.). These results are in TABLE S-1 (Section 10, Page 86).

The local I.E.P.A. office was notified during this work and before the hole was backfilled in an effort to give them a look at the operation; they declined.

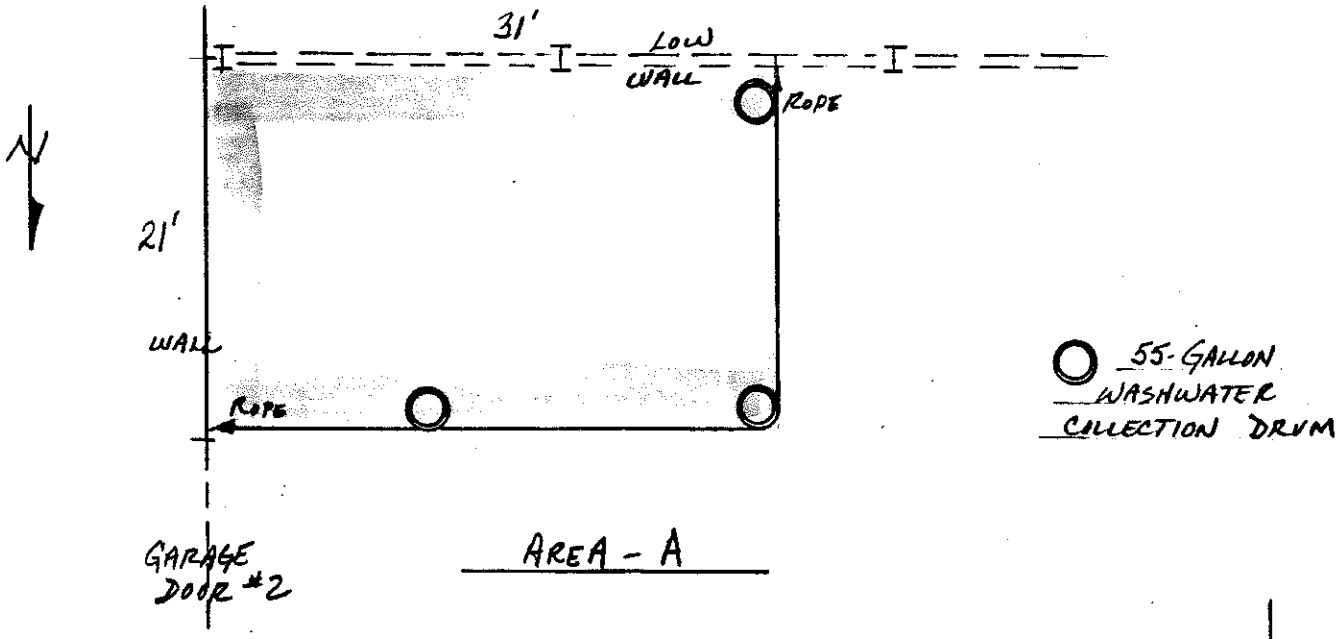
The holes were backfilled with compacted sand and new concrete was poured during the week of 10/10/87.

TABLE - WW1 ROCK STREET - HAZARDOUS WASTE STORAGE CLOSURE -

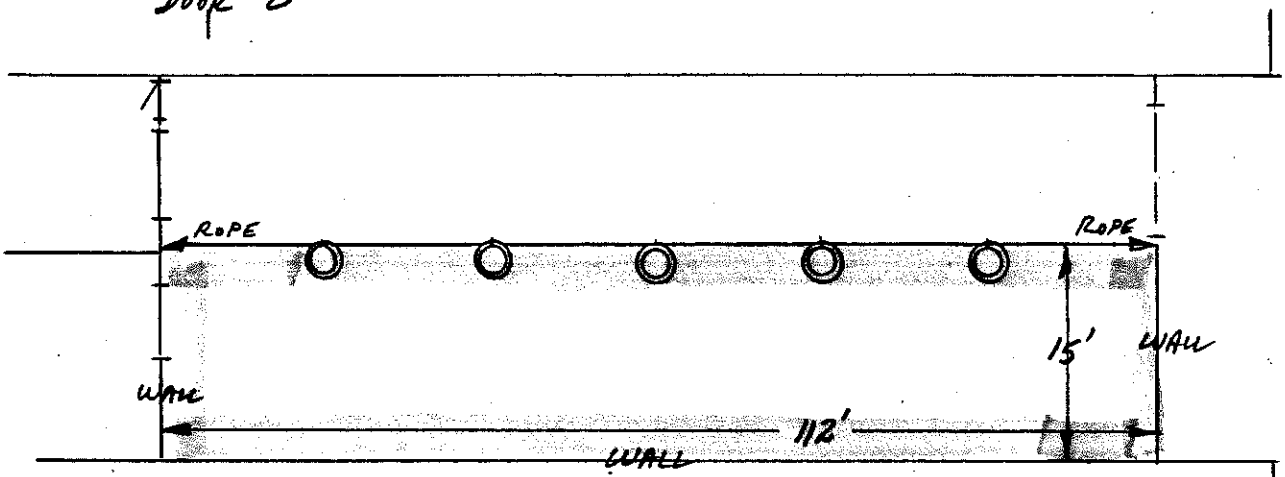
ANALYTICAL RESULTS-WASHWATER-AREAS A,B,&C

Plan Limits	Parameters	Area	A2	B2	C2	A3	B3	C3	A	B	C	A	C	A
		Sample Date	6/20/87	6/20/87	6/20/87	7/2/87	7/2/87	7/2/87	8/29/87	8/29/87	8/29/87	9/8/87	9/8/87	9/21/87
		Sample #	47448	47449	47450	47642	47643	47644	48630	48631	48632	48789	48790	49044
		Result Date	7/17/87	7/17/87	7/17/87	7/17/87	7/17/87	7/17/87	9/8/87	9/8/87	9/8/87	9/14/87	9/14/87	9/30/87
1.00	Cyanide (Total)		0.013*	0.156*	0.089*	-	-	-	-	-	-	-	-	-
14.4	Phenol		-	-	(0.001*	-	-	-	-	-	-	-	-	-
2.13	Tot. Organic Halogen		0.073*	1.00*	0.453*	-	-	-	-	-	-	-	-	-
0.15	Cadmium (Total)		0.060*	1.41	0.070*	-	0.640	-	-	0.080*	-	-	-	-
1.00	Chromium (Total)		0.280*	254.	4.12	-	47.6	46.2	-	0.910*	1.15	-	0.640*	-
1.00	Copper (Total)		0.790*	1.63	0.880*	-	8.73	-	-	0.110*	-	-	-	-
1.00	Nickel (Total)		3.20	5.00	1.00*	1.2	6.5	12.5	4.8	0.20*	1.10	1.70	0.40*	0.310*
1.00	Zinc (Total)		1.62	32.4	4.17	3.51	36.1	41.7	7.2	1.00*	3.23	1.11	0.350*	0.378*
7.2	1,1,1-Trichlor-oethane		(1.0*	(1.0*	(1.0*	-	-	-				-	-	-

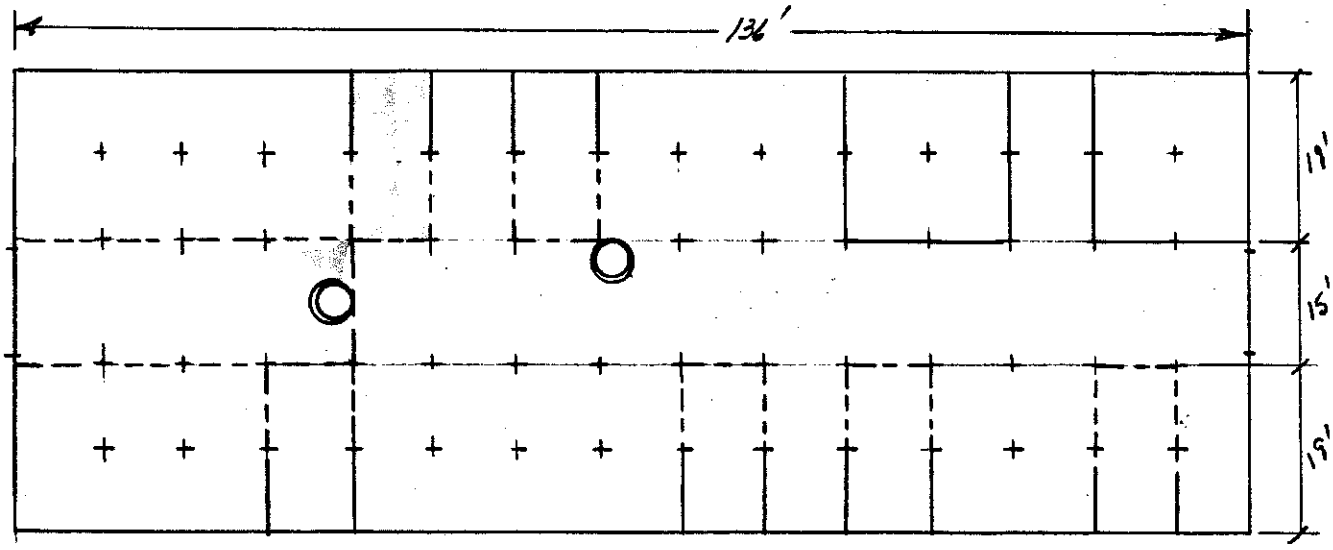
WASHWATER AREAS A, B, C



AREA - A



AREA - B



AREA - C

aqualab inc.

16 July 1987

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

REF: Sample Nos. 47448, 47449, 47450.

Dear Rod,

As you requested, I am attaching a Summary of AQUALAB'S Quality Assurance Program. In addition, our Illinois EPA Certification Number is 100220, and our Wisconsin Department of Natural Resources Certification Number is 999447240.

The Method Codes used for the analyses on the attached reports are:

Cyanide	9010
Total Organic Halogens	9020
Cadmium	7103
Chromium	7190
Copper	7210
Nickel	7520
Zinc	7950
Phenol	420.1
1,1,1 trichlorethane	8240

All methods are EPA approved methods.

If you have any further questions, please feel free to call me at 874-2171.

Sincerely,

Toni

Toni Gartner, Manager
Rockford Division

Q. A. MANUAL SUMMARY

In order to obtain a clearer picture of AQUALAB's commitment to quality, the following is a summary of each section of our Q. A. Manual. For a more detailed review of our program, we invite you to meet with one of our Division Managers at your nearest AQUALAB office.

SECTION 2. QUALITY ASSURANCE OVERVIEW

This section was written to provide a general overview of our Quality Assurance Program, This summary allows the reader to obtain a total picture of our program without reading the entire Q.A. Manual.

SECTION 3. ORGANIZATION FOR QUALITY

The establishment of a quality assurance program, as described in our Quality Assurance Manual, requires the assistance of all the people within AQUALAB to carry out the monitoring, recordkeeping, statistical techniques and other functions required by our system. This total commitment of all personnel to the production of reliable data is dependent upon the conscientious effort of everyone involved. Therefore it is important that each member of the organization have a clear understanding of his or her duties, responsibilities and their relationship to the company-wide effort. This section assists in that understanding by giving a structure and organization to this commitment to quality. Organization charts for the corporation and the divisions along with job descriptions for all personnel are provided.

SECTION 4. COSTS AND BENEFITS

Quality assurance costs are segregated and recorded to identify elements of our quality assurance program whose costs may be disproportionate to the benefits derived. This assists in carrying out policies in the most efficient and economical manner commensurate with continued accuracy and precision of the data produced. Simply stated - what are the real costs associated with our QA program in relationship to the benefits.

SECTION 5. TRAINING

The most important element in providing quality data is our people. Therefore it is vital to make sure every employee is thoroughly knowledgeable in their area of responsibility and can demonstrate competence on a regular basis in documented form. To attain this, we have a formal training program which not only insures that every employee knows what they're doing, but generates confidence that our analytical results are correct. This mandatory training program covers all aspects of our operation, including extensive training in quality assurance and safety.

SECTION 6. PROCEDURE MANUALS

A quality assurance program should assure that all work, from the ordering of materials to the reporting of results, be prescribed in clear and complete written instructions of a type appropriate to the circumstances. Manuals are not only written for our analytical testing programs but also for such aspects of our operation as maintenance, calibration, reporting, quoting, and invoicing. Procedure cards, when appropriate, have been developed for immediate reference.

SECTION 7. FACILITIES

Because of the extent to which the laboratory environment can effect the results of the analysis, the laboratory facility must be carefully planned and that plan periodically evaluated. In general, the physical conditions shall comply with applicable local building codes, OSHA requirements, EPA requirements, and/or other legal requirements. Emphasis will be placed on professionalism, efficiency, and safety.

SECTION 8. PROCUREMENT CONTROL, REAGENTS, AND REFERENCE STANDARDS

The quality of our reagents and chemicals can directly effect the quality of our analytical results. Described in this section are the procedures for ordering, receiving, marking, and storing materials, reagents, and chemicals. Minimum standards are specified to insure that these supplies do not jeopardize the quality of our analytical results.

SECTION 9. MAINTENANCE AND CALIBRATION

Because we rely so heavily on our instruments, it is the purpose of this section to assure that only properly maintained and calibrated instruments and equipment are used in the measurement process. Preventive maintenance is an orderly program of positive actions (equipment cleaning, lubricating, adjusting, reconditioning, and/or testing) to prevent instruments from failing during use. Calibration is the process by which a standard or piece of equipment of a given accuracy is compared against a standard or piece of equipment of a higher accuracy. Adjustments are made as necessary to assure that the standards or equipment are within the prescribed accuracy.

SECTION 10. PACKING AND SHIPPING

Because of the fragile and sometimes sensitive nature of samples and their containers, special precautions must be taken for handling, storage, packing and shipping to protect the integrity of the samples and to minimize damage, loss, deterioration, degradation, and/or modification. This section addresses acceptable sample containers, sample volumes, preservatives, holding times, chain of custody procedures, DOT shipping regulation, and the disposal of samples.

SECTION 11. DOCUMENT CONTROL

Sound procedural documentation of laboratory operations - from dishwashing and balance calibration to maintenance and analytical testing - are essential to overall quality control. Inaccurate or outdated procedures within a facility can cause severe quality problems. It is the purpose of this section therefore, to describe the system we use to ensure that current specifications, methods, and standards are in the hands of users and that they do not use obsolete documents. A system of distribution, review, approval, recall, ad update is established and rigidly utilized.

SECTION 12. DATA HANDLING, REPORTING AND RECORDKEEPING

Essential to our business and clients is a systematic approach to our handling of the large amount of data we generate. This system should allow for rapid information recovery and access. It should also allow for the maintenance and the storage of this data for future reference. It is the purpose of this section

therefore to describe the system and the forms that are used to request, record, transcribe, report, and store the results of our analytical testing.

SECTION 13. CUSTOMER RELATIONS

Vital to our business is the establishment of a good working relationship with our clients. To assist in maintaining that relationship on a professional level, guidelines are established concerning turn-around time, emergency requests, customer complaints, and our rerun policy.

SECTION 14. CALIBRATION CURVES

Calibration curves are plots of the instrument response versus the concentration. 90% of the analyses we perform are based on a calibration curve and the validity of our data is dependent to a great degree on how well these are established. Since it would be impractical to develop a new standard curve every time an analysis is performed, we have established a method for verifying it with each set of samples. It is the purpose of this section to describe how calibration curves are developed and to establish the methods for their verification on a daily basis.

SECTION 15. PRECISION, ACCURACY, AND PERCENT RECOVERY

Our precision, accuracy, and percent recovery program is a continuing, systematic, in-house regimen intended to ensure the production of analytical data of continuing high validity. This is accomplished primarily by running precision, accuracy, and percent recovery control checks with every sample set. Control charts have been developed at the 99% confidence limit to plot this data as it is generated.

SECTION 16. INTERLABORATORY TESTING

The interlaboratory control program involves analysis of check samples (EPA, USGS, ERA, etc.) by each division laboratory in order to assess the continuing capability and relative performance of each. This program shall not be limited to check samples from the corporate office. Check samples from clients, EPA surveys, USGS surveys, certification programs, etc. are also analyzed.

SECTION 17. DATA VALIDATION AND REVIEW

This section describes the process whereby data are screened, and accepted or rejected based on a set of criteria. This involves a critical review of a body of data in order to locate dubious values. It may involve only cursory scan to detect extreme values or a detailed evaluation requiring the use of a computer. Included in this section are anion-cation balances, chemical relationships, etc.

SECTION 18. CLOSED LOOP CORRECTIVE ACTION AND FEEDBACK

Experience has shown that most problems will not disappear until positive action has been taken by management. The significant characteristic of any good management system is the step that closes the loop - the determination to make a change if the system demands it. This section establishes a mode for correcting a deviation, fixing responsibility for the action required, documenting the steps taken, and securing a report on the resolution of the problem.

SECTION 19. SYSTEM AUDITS

Our QA Program dictates a number of steps, procedures, and documentations that must be followed in order to ensure the accuracy and reliability of our results. All that is needed then, is a follow-up system to ensure that all items dictated in this manual are being carried out. This section describes the three different auditing systems that we use. 1.) Divisional - each division manager is required to do an internal audit at least every quarter. 2.) Corporate - auditing is performed by the Vice-President of Laboratory Operations at least annually. 3.) Other - These audits are performed by our clients or regulatory agencies as needed to satisfy their own QA programs or as a prerequisite to obtaining a specific job or certification.

aqualab inc.

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

07-17-87

SAMPLE DESCRIPTION: Rock St., Washwater

Date Received: 06-22-87 0820

47448 Area A2 06-20-87 1030

Cyanide, Total	0.013	mg/L
Total Organic Halogens	0.073	mg/L
Cadmium	0.060	mg/L
Chromium, Total	0.280	mg/L
Copper	0.790	mg/L
Nickel	3.20	mg/L
Zinc	1.62	mg/L
1,1,1-Trichloroethane	<1.0	ug/L

47449 Area B2 06-20-87 1500

Cyanide, Total	0.156	mg/L
Total Organic Halogens	1.00	mg/L
Cadmium	1.41	mg/L
Chromium, Total	254.	mg/L
Copper	1.63	mg/L
Nickel	5.00	mg/L
Zinc	32.4	mg/L
1,1,1-Trichloroethane	<1.0	ug/L

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

07-17-87

SAMPLE DESCRIPTION: Rock St., Washwater

Date Received: 06-22-87 0820

47450 Area C2 06-20-87 1615

Cyanide, Total	0.089	mg/L
Phenol	<0.001	mg/L
Total Organic Halogens	0.453	mg/L
Cadmium	0.070	mg/L
Chromium, Total	4.12	mg/L
Copper	0.880	mg/L
Nickel	1.00	mg/L
Zinc	4.17	mg/L
1,1,1-Trichloroethane	<1.0	ug/L

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

07-17-87

SAMPLE DESCRIPTION: Washwater Samples

Date Received: 07-06-87

47642	Area A3		07-02-87	0745	
	Nickel	1.2			mg/L
	Zinc	3.51			mg/L
47643	Area B3		07-02-87	0730	
	Cadmium	0.640			mg/L
	Chromium, Total	47.6			mg/L
	Copper	8.73			mg/L
	Nickel	6.5			mg/L
	Zinc	36.1			mg/L
47644	Area C3		07-02-87	0730	
	Chromium, Total	46.2			mg/L
	Nickel	12.5			mg/L
	Zinc	41.7			mg/L

Toni Gartner, Manager
Rockford Division

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3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-08-87

SAMPLE DESCRIPTION: Rock Street Washwater

Date Received: 08-31-87 0810

48630	Area A		08-29-87 1200	
	Nickel	4.8		mg/L
	Zinc	7.20		mg/L
48631	Area B		08-29-87 1200	
	Cadmium	0.080		mg/L
	Chromium, Total	0.910		mg/L
	Copper	0.110		mg/L
	Nickel	0.20		mg/L
	Zinc	1.00		mg/L
48632	Area C		08-29-87 1200	
	Chromium, Total	1.15		mg/L
	Nickel	1.10		mg/L
	Zinc	3.23		mg/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-14-87

SAMPLE DESCRIPTION: Washwater (Rock Street)

Date Received: 09-08-87 1020

48789	Area A		09-08-87 0930	
	Nickel	1.70		mg/L
	Zinc	1.11		mg/L
48790	Area C		09-08-87 0930	
	Chromium, Total	0.640		mg/L
	Nickel	0.40		mg/L
	Zinc	0.350		mg/L

Toni Gartner, Manager
Rockford Division

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ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-30-87

Sample No: 49044

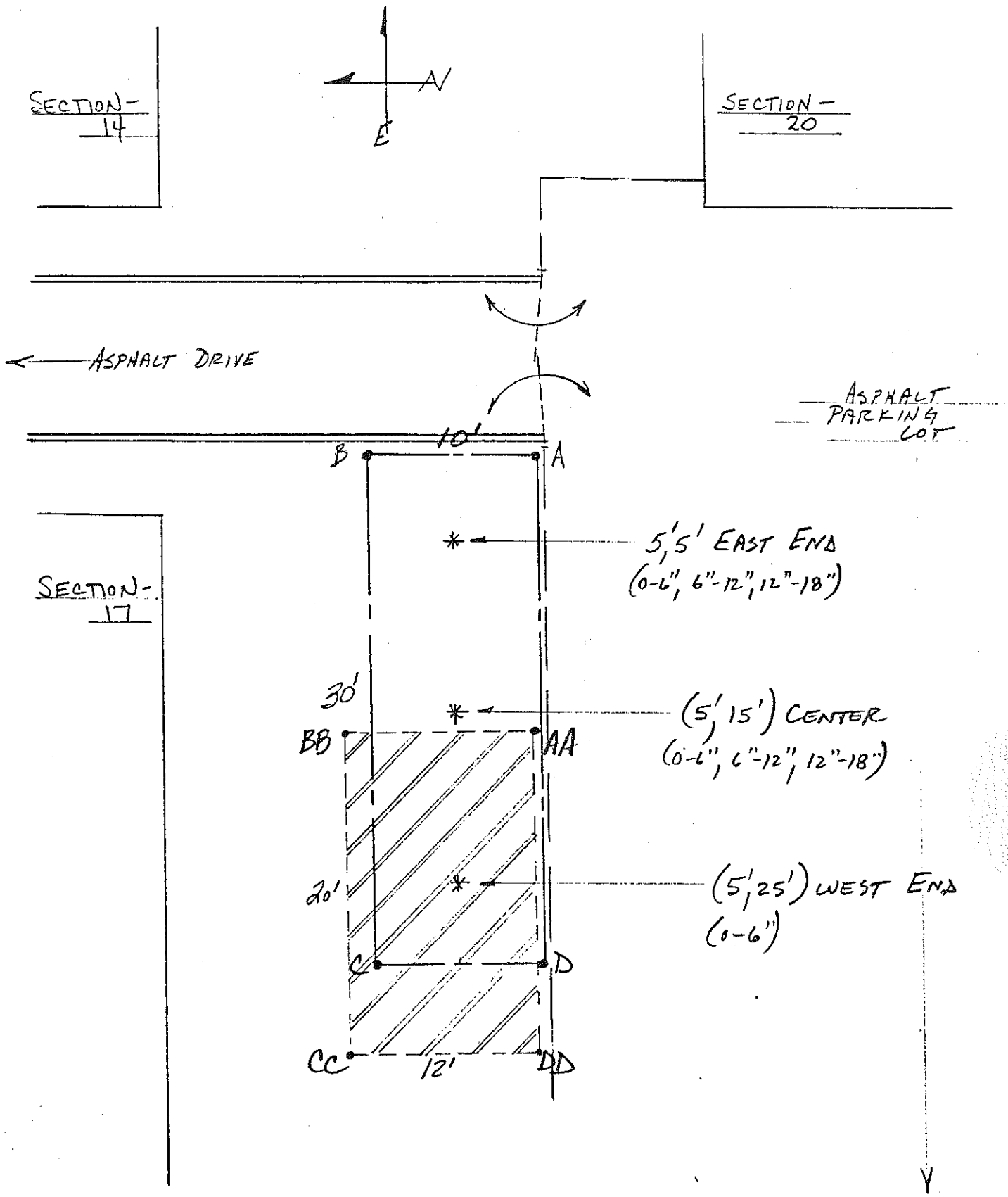
SAMPLE DESCRIPTION: Washwater Area A4 - Rock Street

Date Taken: 09-21-87 0745

Date Received: 09-21-87 0810

Nickel	0.310	mg/L
Zinc	0.378	mg/L

Toni Gartner, Manager
Rockford Division



STORAGE AREA - D (10' x 30') (ABCD)

* SOIL SAMPLES - LOCATIONS

AREA REMOVED (AA-BB-CC-DD) TO 24" DEEP

5/02/87

LABORATORY REPORT

PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07492 E / 0" - 6"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01 MG/L	5.0	
NICKEL EP			<0.03 MG/L	35.0	
ZINC - EP			0.42 MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT.
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT. WI DNR LAB CERTIFICATION #241283020/A.I.H.A. ACCREDITED.
N/T = NOT TESTED N/A = NOT APPLICABLE APPROVAL JW

5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07493 E / 6" - 12"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01	MG/L	5.0	
NICKEL EP			<0.03	MG/L	35.0	
ZINC - EP			0.11	MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
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5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07494 E / 12" - 18"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01	MG/L	5.0	
NICKEL EP			<0.03	MG/L	35.0	
ZINC - EP			0.08	MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
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5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07495 C / 0" - 6"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01	MG/L	5.0	
NICKEL EP			<0.03	MG/L	35.0	
ZINC - EP			<0.01	MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
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5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07496 C / 6" - 12"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01 MG/L	5.0	
NICKEL EP			0.03 MG/L	35.0	
ZINC - EP			0.59 MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
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N/T = NOT TESTED N/A = NOT APPLICABLE APPROVAL JW

CBC ENVIRONMENTAL SERVICES

5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07497 C / 12" - 18"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
CHROMIUM - EP			0.03	MG/L	5.0	
NICKEL EP			<0.03	MG/L	35.0	
ZINC - EP			0.01	MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
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5/02/87 LABORATORY REPORT PAGE 1

H198 8414731 B19

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87118-H07498 W / 0" - 6"
DATE COLLECTED 4/27/87 DATE RECEIVED 4/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
CHROMIUM - EP			<0.01	MG/L	5.0	
NICKEL EP			0.07	MG/L	35.0	
ZINC - EP			1.2	MG/L	200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT.
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT. WI DNR LAB CERTIFICATION #241283020/A.I.H.A. ACCREDITED.
N/T = NOT TESTED N/A = NOT APPLICABLE APPROVAL JW

CBC ENVIRONMENTAL SERVICES

5/28/87 LABORATORY REPORT PAGE 1

H198 8415219 B16
JU/05/* / /

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 87140-H07492 87118 - H07498 / W/0" - 6" / RE-RUN
DATE COLLECTED 4/27/87 DATE RECEIVED 5/20/87

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ.CODE
ZINC - EP	2.6	MG/L		200.0	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT.
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT. WI DNR LAB CERTIFICATION #241283020/A.I.H.A. ACCREDITED.
N/T = NOT TESTED N/A = NOT APPLICABLE APPROVAL

aqualab inc.

)RRECTED REPORT

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

12-18-87

Sample No: 47703

SAMPLE DESCRIPTION: Area D Soil Sample

Date Taken: 07-02-87 0745

Date Received: 07-09-87

Alkalinity, Total (CaCO3)	3,200.	ug/g
Color, Apparent	Brown	
Cyanide, Total	0.930	ug/g
Density, Nonaqueous	135.26	lb/ft3
Solids, Total(non-aqueous)	93.78	%
Sulfide	<0.1	ug/g
Paint Filter	Y	
Arsenic	0.083	ug/g
Barium	19.0	ug/g
Cadmium	5.85	ug/g
Chromium, Total	32.6	ug/g
Lead	127.	ug/g
Mercury	<0.010	ug/g
Selenium	<0.050	ug/g
Silver	1.60	ug/g
Corrosivity (pH)	8.18	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
Reactive Sulfide	<0.25	ug/g
Reactive Cyanide	0.045	ug/g
EP Tox - Cadmium	0.011	mg/L
EP Tox - Chromium	0.256	mg/L
EP Tox - Lead	0.08	mg/L
Acid Compatability	Mild Bubbling Reaction	
Base Compatability	No reaction	
Water Compatability	No reaction	

Toni Gartner, Manager
Rockford Division

Illinois Environmental Protection Agency

Permit #880015 -

Issued to: Barber Colman Co.
1300 Rock St.

Disposal Site: Browning & Ferris Ind.
I.D. #0978020001

NOTE: The original permit copy was mailed to us 1/25/88; upon its receipt, it will be mailed to you.

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

01-22-88

Sample No: 51933

SAMPLE DESCRIPTION: Soil at 24'' Deep - Area ''D''

Date Taken: 01-18-88 0800

Date Received: 01-18-88 0822

EP Tox - Chromium	<0.001	mg/L
EP Tox - Nickel	<0.01	mg/L
EP Tox - Zinc	0.477	mg/L

Toni Gartner, Manager
Rockford Division

TABLE S-1

ROCK STREET CLOSURE - SOIL SAMPLE RESULTS"

LOCATION		Area B-W	Area B-W	Area B-W	Area B-E	Area B-W	Area B-E	Area B-W	Area B-E
DATE		9/10/87	9/10/87	9/10/87	9/11/87	9/15/87	9/15/87	10/1/87	10/1/87
S. C. #		1-B	1-B	2-B	2-BE	1-NW	3-E	B-West	B-East
LAB SAMPLE #1		48836	48834	48835	48908	48935	48934	49222	49223
LAB SAMPLE #2		---	---	---	---	49393	---	---	---
DESCRIPTION		Concrete	Soil	Soil	Soil	Soil	Soil	Soil	Soil
DEPTH		Surface	12"	12"	18"	30"	30"	30"	30"
	Limit								
Cyanide (Total)	0.025	(0.05	(0.05	(0.05	0.06	(0.025*	0.16	---	---
E.P. Tox(Chromium)	1.00	540.0	2.22	0.040	0.125	0.013*	0.016*	0.126*	0.006*
E.P.Tox (Copper)	0.02	---	---	---	---	0.014*	---	0.036	0.002*
E.P.Tox (Nickel)	1.00	---	---	---	---	0.040*	---	0.043*	0.010*
E.P.Tox (Zinc)	1.00	---	---	---	---	0.708*	---	2.11	0.046*
P.Tox (Cadmium)	0.05	0.037	0.007	0.154	---	---	0.048*	0.056	---

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-29-87

Sample No: 48836

SAMPLE DESCRIPTION: 1B Concrete West End Rock Street
Represents .5% Removal

Date Taken: 09-10-87 0800

Date Received: 09-10-87 0840

Cyanide, Total	<0.05	ug/g
Phenol	0.119	ug/g
Sulfide	<0.1	ug/g
Total Organic Halogens	10.	ug/g
Arsenic	<0.05	ug/g
Barium	48.5	ug/g
Cadmium	6.80	ug/g
Chromium, Hex - EP Tox	103.	mg/L
Chromium, Total	11,550.	ug/g
Copper	8.47	ug/g
Lead	56.5	ug/g
Mercury	0.02	ug/g
Nickel	55.0	ug/g
Selenium	<0.05	ug/g
Silver	0.950	ug/g
Zinc	1,350.	ug/g
Corrosivity (pH)	10.76	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
EP Tox - Cadmium	0.037	mg/L
EP Tox - Chromium	540.	mg/L*
EP Tox - Lead	0.37	mg/L

*Analyzed by Method of Standard Additions.

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-29-87

SAMPLE DESCRIPTION: Rock Street Soil Samples

Date Received: 09-10-87 0840

48834 1B Next to Tunnel 09-10-87 0800

Cyanide, Total	<0.05	ug/g
Phenol	<0.025	ug/g
Sulfide	<0.1	ug/g
Total Organic Halogens	0.04	ug/g
Arsenic	<0.05	ug/g
Barium	26.0	ug/g
Cadmium	4.00	ug/g
Chromium, Total	38.4	ug/g
Copper	20.3	ug/g
Lead	17.0	ug/g
Mercury	0.08	ug/g
Nickel	17.0	ug/g
Selenium	<0.05	ug/g
Silver	0.250	ug/g
Zinc	344.	ug/g
Corrosivity (pH)	7.23	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
EP Tox - Cadmium	0.007	mg/L
EP Tox - Chromium	2.22	mg/L
EP Tox - Lead	0.06	mg/L

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

09-29-87

SAMPLE DESCRIPTION: Rock Street Soil Samples

Date Received: 09-10-87 0840

48835 2B West of Tunnel,4' 09-10-87 0730

Cyanide, Total	<0.05	ug/g
Phenol	<0.025	ug/g
Sulfide	<0.1	ug/g
Total Organic Halogens	37.	ug/g
Arsenic	<0.05	ug/g
Barium	23.5	ug/g
Cadmium	70.5	ug/g
Chromium, Total	28.3	ug/g
Copper	307.	ug/g
Lead	100.	ug/g
Mercury	0.16	ug/g
Nickel	135.	ug/g
Selenium	<0.05	ug/g
Silver	0.350	ug/g
Zinc	305.	ug/g
Corrosivity (pH)	7.06	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
EP Tox - Cadmium	0.154	mg/L
EP Tox - Chromium	0.040	mg/L
EP Tox - Lead	0.07	mg/L

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

CORRECTED REPORT

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

10-13-87

Sample No: 48908

SAMPLE DESCRIPTION: #2BE - 18'' Depth (Soil)
Rock Street Soil

Date Taken: 09-11-87 0800

Date Received: 09-11-87 1650

Cyanide, Total	0.06	ug/g
Phenol	<0.025	ug/g
Sulfide	<0.1	ug/g
Total Organic Halogens	0.14	ug/g
Arsenic	<0.05	ug/g
Barium	25.5	ug/g
Cadmium	0.35	ug/g
Chromium, Total	8.05	ug/g
Copper	8.20	ug/g
Lead	19.5	ug/g
Mercury	<0.01	ug/g
Nickel	11.5	ug/g
Selenium	<0.05	ug/g
Silver	0.15	ug/g
Zinc	33.5	ug/g
Corrosivity (pH)	7.09	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
EP Tox - Chromium	0.125	mg/L
EP Tox - Lead	0.02	mg/L

T. Gartner

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

10-02-87

Sample No: 48935

SAMPLE DESCRIPTION: #1 NW at 30 inch depth
Rock Street Soil Sample
Date Taken: 09-15-87 0815

Date Received: 09-15-87

Arsenic	<0.05	ug/g
Barium	45.5	ug/g
Cadmium	0.95	ug/g
Chromium, Total	6.60	ug/g
Copper	20.2	ug/g
Lead	54.5	ug/g
Mercury	0.07	ug/g
Nickel	15.0	ug/g
Selenium	<0.05	ug/g
Silver	0.40	ug/g
Zinc	90.5	ug/g
EP Tox - Chromium	0.013	mg/L
EP Tox - Lead	0.06	mg/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

11-03-87

Sample No: 49393

SAMPLE DESCRIPTION: #1 NW at 30'' depth
Rock Street Soil
Date Taken: 09-15-87 0815

Date Received: 09-15-87

Cyanide, Total	<0.05	ug/g
pH	8.44	units
Reactive Cyanide	<0.025	ug/g
EP Tox - Copper	0.014	mg/L
EP Tox - Nickel	0.04	mg/L
EP Tox - Zinc	0.708	mg/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

10-02-87

Sample No: 48934

SAMPLE DESCRIPTION: #3 East at 30 inch depth
Rock Street Soil Sample
Date Taken: 09-15-87 0815

Date Received: 09-15-87

Cyanide, Total	0.16	ug/g
Phenol	<0.025	ug/g
Sulfide	<0.1	ug/g
Total Organic Halogens	0.17	ug/g
Arsenic	<0.05	ug/g
Barium	39.5	ug/g
Cadmium	3.95	ug/g
Chromium, Total	18.7	ug/g
Copper	30.0	ug/g
Lead	31.0	ug/g
Mercury	0.03	ug/g
Nickel	48.5	ug/g
Selenium	<0.05	ug/g
Silver	1.05	ug/g
Zinc	300.	ug/g
Corrosivity (pH)	7.59	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
EP Tox - Cadmium	0.048	mg/L
EP Tox - Chromium	0.016	mg/L
EP Tox - Lead	0.08	mg/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

10-15-87

SAMPLE DESCRIPTION: Rock Street Soil Area B

Date Received: 10-01-87 1420

49222 West End 30inch Depth 10-01-87 1330

Arsenic	<0.05	ug/g
Barium	19.5	ug/g
Cadmium	11.4	ug/g
Chromium, Total	28.1	ug/g
Copper	247.	ug/g
Lead	65.	ug/g
Mercury	<0.01	ug/g
Nickel	85.	ug/g
Selenium	<0.05	ug/g
Silver	0.800	ug/g
Zinc	419.	ug/g
EP Tox - Cadmium	0.056	mg/L
EP Tox - Chromium	0.126	mg/L
EP Tox - Lead	0.04	mg/L
EP Tox - Copper	0.036	mg/L
EP Tox - Nickel	0.43	mg/L
EP Tox - Zinc	2.11	mg/L

T. Gartner R

Toni Gartner, Manager
Rockford Division

aqualab inc.

3548 35th Street, Rockford, Illinois 61109 815/874-2171

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

10-15-87

SAMPLE DESCRIPTION: Rock Street Soil Area B

Date Received: 10-01-87 1420

49223 East End 30inch Depth 10-01-87 1330

Arsenic	<0.05	ug/g
Barium	2.50	ug/g
Cadmium	0.600	ug/g
Chromium, Total	8.10	ug/g
Copper	6.9	ug/g
Lead	8.50	ug/g
Mercury	<0.01	ug/g
Nickel	5.50	ug/g
Selenium	<0.05	ug/g
Silver	0.150	ug/g
Zinc	85.0	ug/g
EP Tox - Chromium	0.006	mg/L
EP Tox - Lead	<0.01	mg/L
EP Tox - Copper	0.002	mg/L
EP Tox - Nickel	<0.01	mg/L
EP Tox - Zinc	0.046	mg/L

T. Gartner R

Toni Gartner, Manager
Rockford Division

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

NOVEMBER 12, 1987
APPLICATION RECEIVED: 11/05/87
PERMIT NUMBER 870752-0978020001
PERMIT ISSUED TO:

WASTE STREAM NUMBER 870752
PERMIT EXPIRES: 12/01/88

BROWNING-FERRIS INDUSTRIES
1827 WALDEN-SUITE 107
SCHAUMBURG , IL
60173

BROWNING-FERRIS INDUSTRIES
1827 WALDEN-SUITE 107
SCHAUMBURG , IL
60173

WASTE NAME: CONCRETE FROM CLOSURE CLEAN-UP
WASTE CLASS 40 HAZARDOUS SUBJECT TO FEE

USEPA HAZARDOUS WASTE NUMBERS:
D007

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: BROWNING-FERRIS INDUSTRIES #1 IEPA SITE NO.: 0978020001

DISPOSITION OF WASTE: 25
BULK OR CONTAINERIZED MIXED WITH DAILY REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: ROD JOHNSON
WASTE GENERATOR: BARBER-COLMAN CO
P.O. BOX 2950
LOVES PARK IL
61132

IEPA GENERATOR NO.: 2010300054
BARBER-COLMAN CO
ROCKFORD IL
61101

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. PURSUANT TO SECTION 39(H) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, AUTHORIZATION IS GRANTED FOR LAND DISPOSAL OF THIS WASTE. THIS AUTHORIZATION IS SUBJECT TO ANY CONDITIONS CONTAINED HEREIN.

2. AFTER RECEIPT AT THIS SITE, BUT PRIOR TO DISPOSAL, EVERY CONTAINER MUST BE SAMPLED AND ANALYZED BY THE PAINT FILTER TEST DESCRIBED IN 35 IAC, SECTION 729.320. NO WASTES THAT YIELD FLUID MAY BE DISPOSED.

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

NOVEMBER 12, 1987 WASTE STREAM NUMBER 870752
APPLICATION RECEIVED: 11/05/87 PERMIT EXPIRES: 12/01/88
PERMIT NUMBER 870752-097802000I

LWE:MAS
CC:BARBER-COLMAN CO
C - REGION: MAYWOOD

LAWRENCE W. EASTEP, P.E.
MANAGER, PERMIT SECTION
DIVISION OF LAND POLLUTION CONTROL

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

NOVEMBER 23, 1987
APPLICATION RECEIVED: 11/05/87
PERMIT NUMBER 870751-1418210001
PERMIT ISSUED TO:

WASTE STREAM NUMBER - 870751
PERMIT EXPIRES: 11/18/88

BROWNING-FERRIS INDUSTRIES
1827 WALDEN-SUITE 107
SCHAUMBURG , IL
60173

BROWNING-FERRIS INDUSTRIES
1827 WALDEN-SUITE 107
SCHAUMBURG , IL
60173

WASTE NAME: SOIL FROM CLOSURE CLEAN UP
WASTE CLASS 80 NON-HAZARDOUS

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: BROWNING-FERRIS INDUSTRIES IEPA SITE NO.: 1418210001

DISPOSITION OF WASTE: 25
BULK OR CONTAINERIZED MIXED WITH DAILY REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: ROD JOHNSON
WASTE GENERATOR: BARBER-COLMAN CO
P.O. BOX 2950
LOVES PARK IL
61132

IEPA GENERATOR NO.: 2010300054
BARBER-COLMAN CO
ROCKFORD IL
61101

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. THE PERMITTEE SHALL NOT DISPOSE OF ANY WASTE OTHERWISE AUTHORIZED FOR DISPOSAL BY THIS PERMIT IF SUCH WASTE IS A LIQUID WASTE AS DETERMINED BY 35 ILL. ADM. CODE 729.320.

Lawrence W. Easter by R

LWE:SAS
CC:BARBER-COLMAN CO
REGION: ROCKFORD

LAWRENCE W. EASTER, P.E.
MANAGER, PERMIT SECTION
DIVISION OF LAND POLLUTION CONTROL

TABLE M-1

MANIFESTS - WASTE VOLUME - TRANSPORTER - DISPOSAL SITE

DATE	MANIFEST#	WASTE DESCRIPTION	VOLUME	TRANSPORTER	DISPOSAL SITE
4/1/87	IL-1640675	Filter Cake: F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
4/8/87	WI-114361	1,1,1Trichloroethane	11 drums	Hydrite Chem. Inc.	Avganic Ind.,Inc.
4/24/87	MI-0890241	Haz. Waste Solid-Black Oxide; D-007	6 drums	S.E.T. Environmental	Cyanokem, Inc.
5/5/87	IL-1640676	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
5/11/87	IL-1212206	Haz. Waste Liquid-Trench Sludge;D-001	0 drums	S.E.T. Environmental	E.W.R., Inc.
6/10/87	IL-1212181	Haz/Waste Combustible Wav; D-001	7 drums	S.E.T. Environmental	L.W.D.,Inc.
6/11/87	IL-1212165	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
6/16/87	WI-114352	1,1,1Trichloroethane	6 drums	Hydrite Chem. Inc.	Avganic Ind.,Inc.
6/26/87	MI-0890251	Haz. Waste Solid-Yellow Chrome;D-007	2 drums	S.E.T. Environmental	Cyanokem, Inc.
		Chrom/Acid;Liq.;D007	2 drums	S.E.T. Environmental	Cyanokem, Inc.
		Chrom/Acid;Sol.;D007	2 drums	S.E.T. Environmental	Cyanokem, Inc.
7/8/87	IL-1212194	Haz. Waste Solid-Zinc Filters;F-006	2 drums	Browning Ferris Ind.	Browning Ferris Ind.
		Haz. Waste Solid-Nickel Filters;F-006	3 drums	Browning Ferris Ind.	Browning Ferris Ind.
7/15/87	IL-1212166	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
7/27/87	MI-0890255	Cyanide Dry Mix;D003	2 drums	A. & B. Industrial	Cyanokem, Inc.
8/3/87	WI-114362	1,1,1Trichloroethane	6 drums	Hydrite Chem. Inc.	Avganic Ind.,Inc.
8/21/87	IL-1212187	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
9/8/87	IL-1212199	Haz/Waste Combustible Liquid;D-001	3 drums	S.E.T. Environmental	E.W.R., Inc.
9/21/87	WI-114366	1,1,1Trichloroethane	5 drums	Hydrite Chem. Inc.	Avganic Ind.,Inc.

TABLE M-1

MANIFESTS - WASTE VOLUME - TRANSPORTER - DISPOSAL SITE

DATE	MANIFEST#	WASTE DESCRIPTION	VOLUME	TRANSPORTER	DISPOSAL SITE
9/30/87	IL-1873732	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
11/4/87	IL-1873733	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
11/11/87	IL-1212108	Haz/Waste Corrosive Solid; D002	2 drums	S.E.T. Environmental	Alchemtron
11/12/87	IL-1212236	Non-Haz/Not Reg.	2 drums	S.E.T. Environmental	Alchemtron
12/7/87	WE-114360	1,1,1Trichloroethane	6 drums	Hydrite Chem. Inc.	Avganic Ind.,Inc.
12/7/87	IL-1873734	Filter Cake; F-006	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/10/87	IL-1212241	Haz. Waste Solid - Clos. Concrete;D007	12 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/11/87	IL-1212242	Haz. Waste Solid - Clos. Concrete;D007	12 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/14/87	IL-1212243	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/14/87	IL-1212244	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/14/87	IL-1212245	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/14/87	IL-1212246	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/14/87	IL-1873735	Non-Haz/Not Reg.	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/16/87	IL-1212247	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/17/87	IL-1212248	Non-Haz/Not Reg.	15 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.
12/18/87	IL-1212249	Haz/Waste Combustible Liquid;D001	1 drums	S.E.T. Environmental	E.W.R., Inc.
12/18/87	IL-1212179	Haz/Waste Combustible Liquid;D001	3 drums	S.E.T. Environmental	L.W.D.,Inc.
1/28/88	IL-1212209	Non-Haz/Not Reg. Soil Area D.	20 cu.yds	Browning Ferris Ind.	Browning Ferris Ind.

Please print or type. (Form designed for use on elite (12-pitch) typewriter) EPA Form 8700-22 (3-84) Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD005145958 Manifest Document No. 00043
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address
Barber Colman Co. – Colman Metal Finishing
P.O. Box 2940 – Loves Park, Il. 61132-2940
4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number IL 1212242
B. Illinois Generator's ID 2010300514

5. Transporter 1 Company Name: Browning-Ferris Ind., Inc.
6. US EPA ID Number: ILD980700736
C. Illinois Tranporter's ID 0715
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
B.F.I. #1 – Winthrop Harbor
9th + Green Bay Roads
Zion, Il.
10. US EPA ID Number: ILD980700728
G. Illinois Facility's ID 0978020001
H. Facility's Phone (312) 623-3870

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS SUBSTANCE – SOLID – N.O.S. – ORM-E; NA9188; RQ=1#	X	001	CM	00012	Z	EPA HW Number D007; Authorization Number 870752
b.						EPA HW Number; Authorization Number
c.						EPA HW Number; Authorization Number
d.						EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: ROD K. JOHNSON — Signature: Rod Johnson — Date: Month 12 Day 9 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: L A MCIVEEN — Signature: [illegible] — Date: Month 12 Day 9 Year 87

18. Transporter 2 Acknowledgement or Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] — Signature — Date: Month 12 Day [illegible] Year 87

IN ILL. 2-3637 OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675
DISTRIB 1 - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR
REV. # 5 GENERATOR COPY – PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111½, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $10,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6761

IL 532 0610

LPC 62 8 81 Page 102

EPA Form 8700-22 (3-84) Form Approved. OMB No. 2050-0104 Expires 7-31-86

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD005145758 Manifest Document No. 00042

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law

3. Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box 2940 - Loves Park Il. 61132-2940

A. Illinois Manifest Document Number IL 1212241

4. Generator's Phone (815) 968-0660

B. Illinois Generator's ID 2010300054

5. Transporter 1 Company Name: Browning-Ferris Ind., Inc.

6. US EPA ID Number: ILD980700736

C. Illinois Tranporter's ID 0715

D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
B.F.I. #1 - Winthrop Harbor
9th + Green Bay Roads
Zion, Il.

10. US EPA ID Number: ILD980700728

G. Illinois Facility's ID 0978029001

H. Facility's Phone (312) 623-3870

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	HAZARDOUS SUBSTANCE - SOLID - N.O.S.; ORM-E; NA9188; RQ-1#	X	001	CM	00012	L	EPA HW Number D007; Authorization Number 87017512
b.							EPA HW Number; Authorization Number
c.							EPA HW Number; Authorization Number
d.							EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: Rod K. Johnson / Kirit Patel — Signature: Kirit Patel — Date: Month Day Year 12/10/87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JASPER TOLON — Signature: Jasper Tolon — Date: Month Day Year 12/10/87

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: MIKE Ryan — Signature — Date: Month Day Year 12/10/87

IN ILLINOIS: 217 / 782-3637 OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV.# 5

GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111½, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

Please print or type. (Form designed for use on elite (12-pitch) typewriter) EPA Form 8700-22 (3-84) Form Approved. OMB No. 2050-0039 Expires 7-31-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 5 1 4 5 9 5 8 — Manifest Document No. 0 0 0 4 4
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law

GENERATOR

3. Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box 2940 - Loves Park, IL 61132-2940
4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number: IL 1212243
B. Illinois Generator's ID: 2 0 1 1 0 3 0 0 0 5 4

5. Transporter 1 Company Name: Browning & Ferris Ind., Inc.
6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
C. Illinois Tranporter's ID: 0 7 1 5
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. Illinois Transporter's ID:
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind., Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
G. Illinois Facility's ID: 1 4 1 8 2 1 0 0 0 1
H. Facility's Phone: (815) 397-5766

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Non-Hazardous; Not Regulated		0 0 1	C M	0 0 0 1 5	2	EPA HW Number: NJA1 Authorization Number: 870751
b.						EPA HW Number: Authorization Number:
c.						EPA HW Number: Authorization Number:
d.						EPA HW Number: Authorization Number:

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

"I have taken all practical steps to minimize waste according to RCRA."

ATTENTION: DISPOSAL FACILITY
FORWD. COMPLT. MANIFEST - PART 1
TO: BARBER COLMAN CO. D./07-1088
555 COLMAN CENTER DRIVE
P.O. BOX 7040
ROCKFORD, IL 61125-7040

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: Kirit Patel — Signature: Kirit Patel — Date: Month 12 Day 14 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Lon Tyggestad — Signature: Lon Tyggestad — Date: Month 12 Day 14 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Date: Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Gregory S. Gratti — Signature: Gregory S. Gratti — Date: Month 12 Day 14 Year 87

IN ILLINOIS: 217 / 782-3637 — *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* — OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. 4 5

GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 5 1 4 5 9 5 8 | Manifest Document No. 0 0 0 4 5 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law but is required by Illinois law

3. Generator's Name and Mailing Address
Barber Colman Co. Colman Metal Finishing
P.O. Box 2940 - Loves Park, IL 61132-2940

4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number IL 1212244

B. Illinois Generator's ID 2 0 1 0 3 0 0 0 5 4

5. Transporter 1 Company Name: Browning & Ferris Ind., Inc.
6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
C. Illinois Tranporter's ID 0 7 1 5
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind, Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
G. Illinois Facility's ID 1 4 1 8 2 1 0 0 0 1
H. Facility's Phone (815) 397-5766

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		Non-Hazardous; Not Regulated	0 0 1	C M	0 0 0 15	2	EPA HW Number: NLA; Authorization Number: 8 7 0 7 5 1
b.							EPA HW Number; Authorization Number
c.							EPA HW Number; Authorization Number
d.							EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

"I have taken all practical steps to minimize waste according to RCRA."

ATTENTION: DISPOSAL FACIITY
FORWD. COMPLT. MANIFEST - PART 1
TO: BARBER COLMAN CO. D. /07-1088
555 COLMAN CENTER DRIVE
P.O. BOX 7040
ROCKFORD, IL 61125-7040

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: DALE PARK | Signature | Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Lon Tryggestad | Signature | Date: Month Day Year 1 2 1 4 8 7

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: GREGORY S. GULATTO | Signature | Date: Month Day Year 1 2 1 6 8 7

IN ILLINOIS: 217 / 782-3637 24 HOUR EMERGENCY [illegible] OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5

GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of the information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

Please print or type (Form designed for use on elite (12-pitch) typewriter) EPA Form 8700-22 (3-84) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 5 1 4 5 9 5 8 Manifest Document No. 0 0 0 4 6
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law

3. Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box 2940 - Loves Park, IL 61132-2940
4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number IL 1212245
B. Illinois Generator's ID 2010300054

5. Transporter 1 Company Name: Browning & Ferris Ind. Inc.
6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
C. Illinois Transporter's ID 0715
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind., Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
G. Illinois Facility's ID 1418210001
H. Facility's Phone (815) 397-5766

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Non-Hazardous; Not Regulated		001	CM	000 ~~20~~ 15	2	EPA HW Number N.A.; Authorization Number 870751
b.						EPA HW Number; Authorization Number
c.						EPA HW Number; Authorization Number
d.						EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

"I have taken all practical steps to minimize waste according to RCRA."

ATTENTION: DISPOSAL FACILITY
FORWD. COMLPLT. MANIFEST - PART 1
TO: BARBER COLMAN CO. D./07-1088
555 COLMAN CENTER DRIVE
P.O. BOX 7040
ROCKFORD, IL 61125-7040

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: DALE PARKS Signature: Dale Parks Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Lon Tuggestad Signature: [signature] Date Month Day Year 1 21 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: DOM VACCARO Signature: Don Vaccaro Date Month Day Year 1 21 87

IN ILLINOIS: 217 / 782-3637 "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5
GENERATOR COPY — PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

Please print or type (Form designed for use on elite (12-pitch) typewriter) EPA Form 8700-22 (3-84) Form Approved. OMB No. 2050-0039 Expires 7-31-85

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I L D 0 0 5 1 4 5 9 5 8
Manifest Document No.: 0 0 0 4 7
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law

3. Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box 2940 - Loves Park, IL 61132-2940

4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number: IL 1212246

B. Illinois Generator's ID: 2 0 1 0 3 0 0 0 5 4

5. Transporter 1 Company Name: Browning & Ferris Ind., Inc.
6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
C. Illinois Tranporter's ID: 0 7 1 5
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind., Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
G. Illinois Facility's ID: 1 4 1 8 2 1 0 0 0 1
H. Facility's Phone: (815) 397-5766

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Non-Hazardous; Not Regulated		0 0 1	C M	0 0 0 15	2	EPA HW Number: N / A / Authorization Number: 8 7 0 7 5 1
b.							EPA HW Number / Authorization Number
c.							EPA HW Number / Authorization Number
d.							EPA HW Number / Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

"I have taken all practical steps to minimize waste according to RCRA."

ATTENTION: DISPOSAL FACILITY
FORWD. COMPLT. MANIFEST - PART 1
TO: BARBER COLMAN CO. D./07-1088
555 COLMAN CENTER DRIVE
P.O. BOX 7040
ROCKFORD, IL 61125-7040

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: DALE PARKS
Signature:
Date: Month 1 2 Day 1 4 Year 8 7

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials
Printed/Typed Name: Lon Tryggestad
Signature:
Date: Month 1 2 Day 1 4 Year 8 7

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: DOM VACCARO
Signature:
Date: Month 1 2 Day 1 6 Year 8 7

IN ILLINOIS: 217 / 782-3637 *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

Please print or type (Form designed for use on elite (12-pitch) typewriter)

EPA Form 8700-22 (3-84) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 5 1 4 5 9 5 8 | Manifest Document No. 0 0 0 4 8 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is required by Illinois law

3. Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box2940 - Loves Park, IL 61132-2940

4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number IL 1212247

B. Illinois Generator's ID 1 2 0 1 1 0 3 0 1 0 0 0 5 1 4

5. Transporter 1 Company Name: Browning & Ferris Ind., Inc.
6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
C. Illinois Tranporter's ID 0 1 7 1 1 5
D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind., Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6
G. Illinois Facility's ID 1 1 4 1 8 2 1 0 0 0 1 1
H. Facility's Phone (815) 397-5766

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	L Waste No.
a. Non-Hazardous; Not Regulated		0 0 1	CM	0 0 0 15 20	2	EPA HW Number: N/A; Authorization Number: 8 7 0 7 5 1
b.						EPA HW Number; Authorization Number
c.						EPA HW Number; Authorization Number
d.						EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: DALE PARK | Signature | Date: Month Day Year 12 16 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: LON Tryggestad | Signature | Date: Month Day Year 12 16 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: GREGORY S. GIUATTO | Signature | Date: Month Day Year 12 17 87

IN ILLINOIS: 217 / 782-3637 "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5

GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

Please print or type (Form designed for use on elite (12-pitch) typewriter) EPA Form 8700-22 (3-84) Form Approved. OMB No. 2000-0404 Expires 7-31-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 5 1 4 5 9 5 8 | Manifest Document No. 0 0 0 4 9

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is required by Illinois law.

GENERATOR

3. Generator's Name and Mailing Address
Barber Colman co. - Colman Metal Finishing
P.O. box 2940 - Loves Park, IL 61132-2940

4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number IL 1212248

B. Illinois Generator's ID 2 0 1 0 3 0 0 0 5 4

5. Transporter 1 Company Name: Browning & Ferris Ind., Inc.

6. US EPA ID Number: I L D 9 8 0 7 0 0 7 3 6

C. Illinois Tranporter's ID 0 7 1 1 5

D. (815) 397-5766 Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning & Ferris Ind., Inc.
9575 South Highway 251
Davis Junction, IL 61105

10. US EPA ID Number: I L D 9 8 0 7 0 0 0 3 6

G. Illinois Facility's ID 1 4 1 8 2 1 0 0 0 1

H. Facility's Phone (815) 397-5766

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Non-Hazardous; Not regulated		0 0 1	C M	0 0 0 15	2	EPA HW Number: N.A. / Authorization Number: 8 7 0 7 5 1
b.						EPA HW Number / Authorization Number
c.						EPA HW Number / Authorization Number
d.						EPA HW Number / Authorization Number

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons
2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: DALE PARKS | Signature: Dale Parks | Date (Month Day Year): 1 21 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Lon Tryggestad | Signature: Lon Tryggestad | Date (Month Day Year): 1 21 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Gregory S. Gulatto | Signature: Gregory S. Gulatto | Date (Month Day Year): 1 21 87

IN ILLINOIS: 217 / 782-3637 "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. 5

GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6761

IL532-0610
LPC 62 8/81

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (3-84) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD005145958 | Manifest Document No.: 00052 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is required by Illinois law.

GENERATOR

Generator's Name and Mailing Address
Barber Colman Co. - Colman Metal Finishing
P.O. Box 2940 - Loves Park, Il. 61132-2940
4. Generator's Phone (815) 968-0660

A. Illinois Manifest Document Number: IL 1212209
B. Illinois Generator's ID: 2,0,1,0,3,0,0,0,5,4
C. Illinois Tranporter's ID: 0,7,1,5
D. (815) 397-5766 Transporter's Phone

5. Transporter 1 Company Name: Browning Ferris Ind., Inc.
6. US EPA ID Number: ILD980700736
7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
Browning Ferris Industries, Inc.
9575 South Highway 251
Davis Junction, IL 61105
10. US EPA ID Number: ILD980700736
G. Illinois Facility's ID: 1,4,1,8,2,1,0,0,0,1
H. Facility's Phone: (815) 397-5766

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	L Waste No.
a.	Non Hazardous & Not Regulated		001	CM	00020	2	EPA HW Number: N. A. / Authorization Number: 818101115
b.							EPA HW Number / Authorization Number
c.							EPA HW Number / Authorization Number
d.							EPA HW Number / Authorization Number

J. Additional Descriptions for Materials Listed Above
Soil from Closure Storage Area D.

K. Handling Codes for Wastes Listed Above
In Item #14: 1 = Gallons, 2 = Cubic Yards

ATTENTION: DISPOSAL FACILITY
FORWD. COMPLT. MANIFEST - PART 1
TO: BARBER COLMAN CO. D./07-1088
555 COLMAN CENTER DRIVE
P.O. BOX 7040
ROCKFORD, IL 61125-7040

"I have taken all practical steps to minimize waste according to RCRA."

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.

Printed/Typed Name: Rod Johnson | Signature | Date: Month 10 Day 12 Year 88

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date: Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials
Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Date: Month Day Year

IN ILLINOIS: 217 / 782-3637 *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

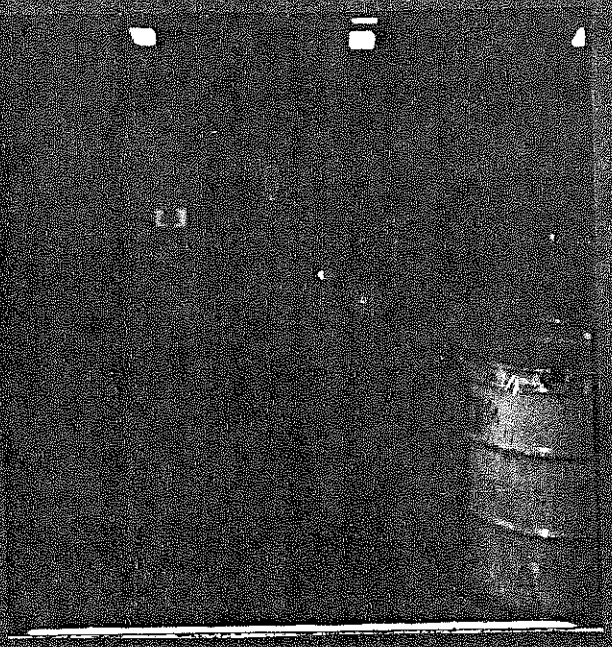
REV. # 5

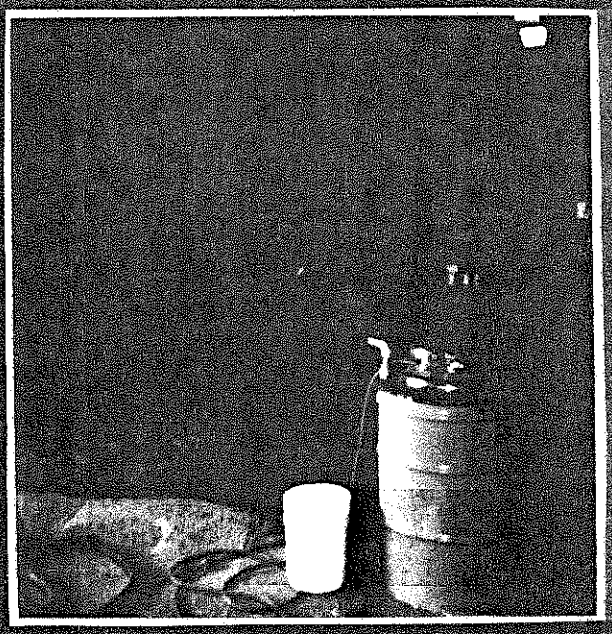
GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

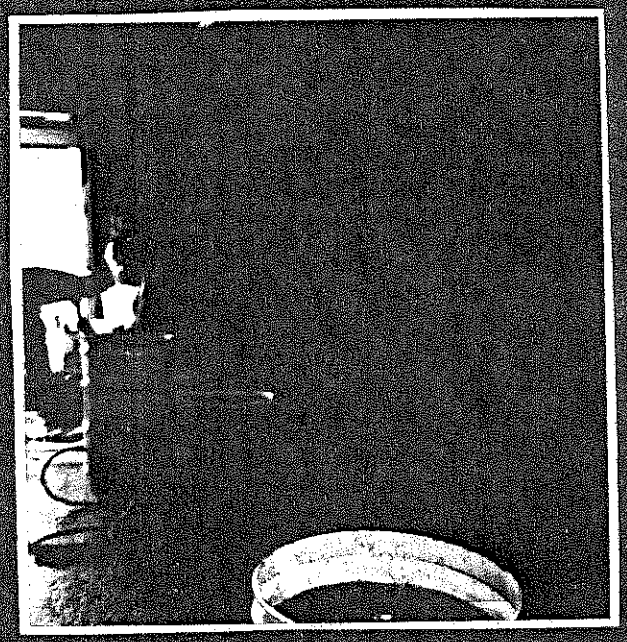
This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

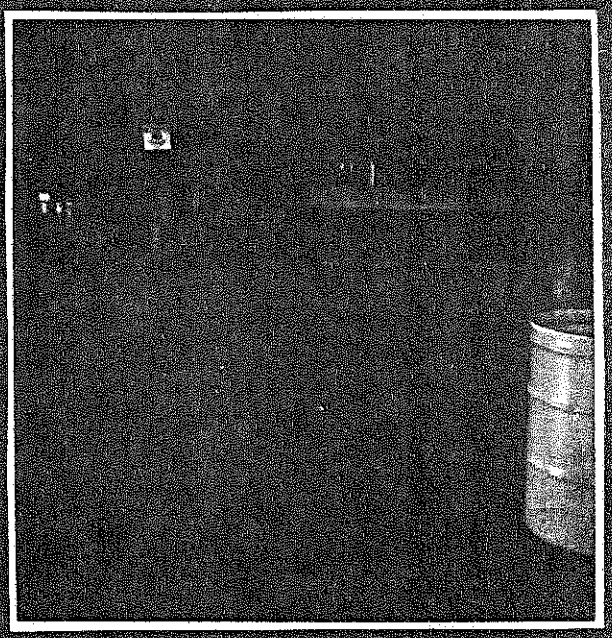
NOTE:

The originals of the pictures were mailed to the State. We Apologize for the poor quality of their reproductions contained on Pages 110-119



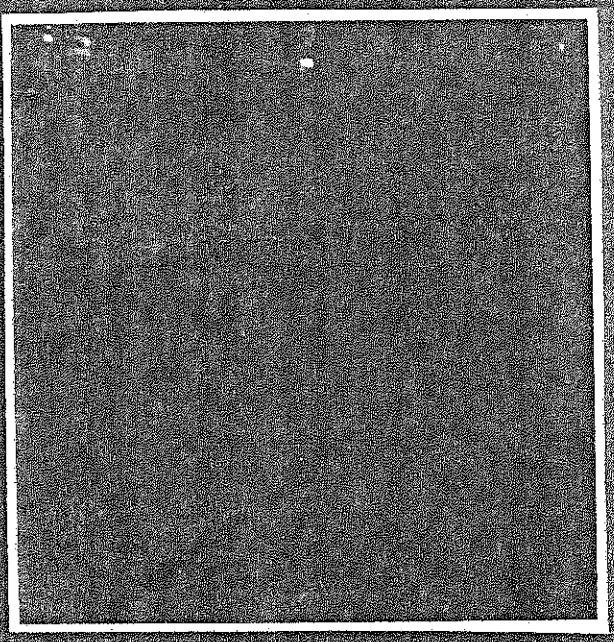


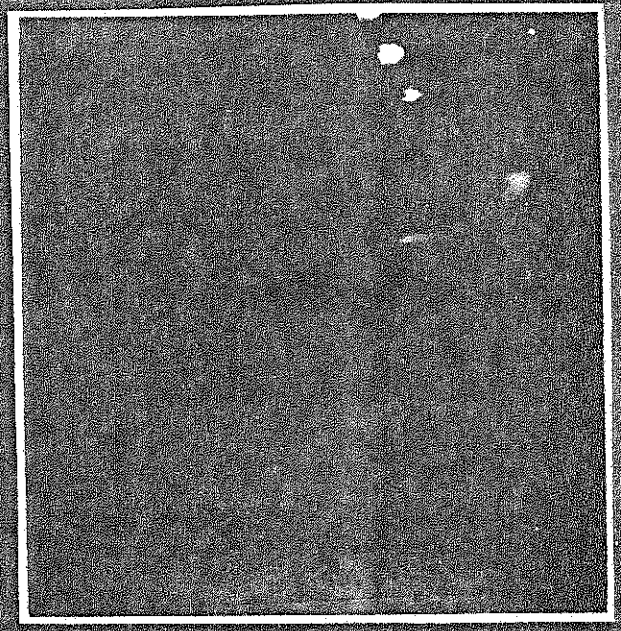


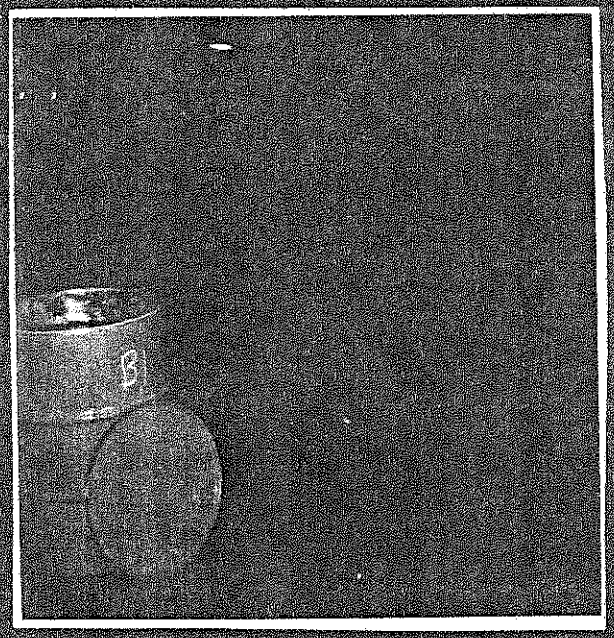


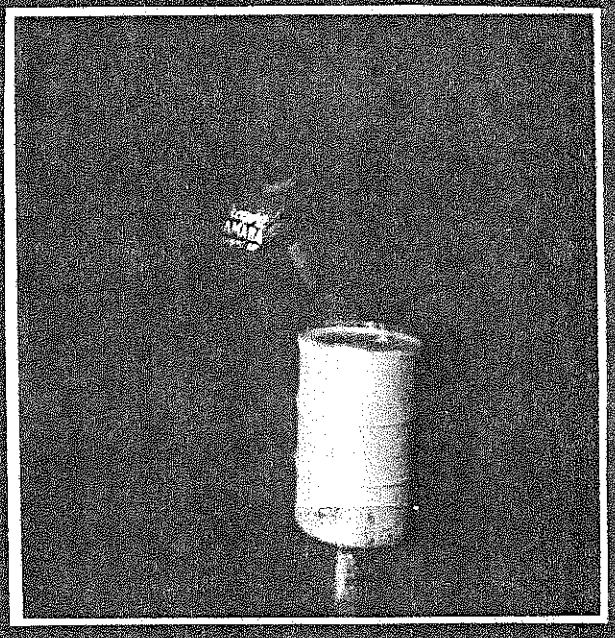
PAGE #110

STORAGE AREA A; 6/20 87 WASH



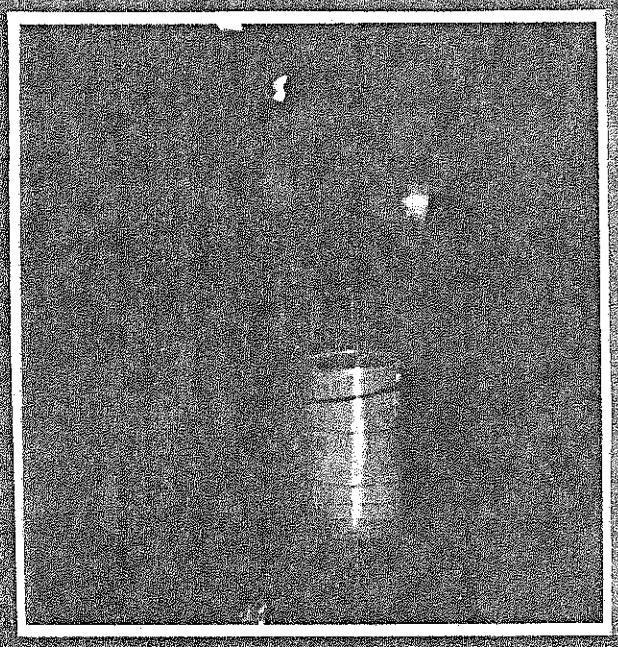


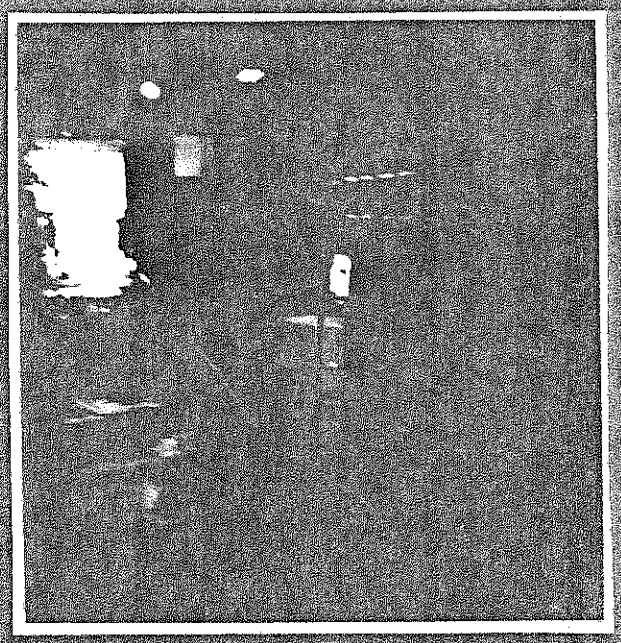


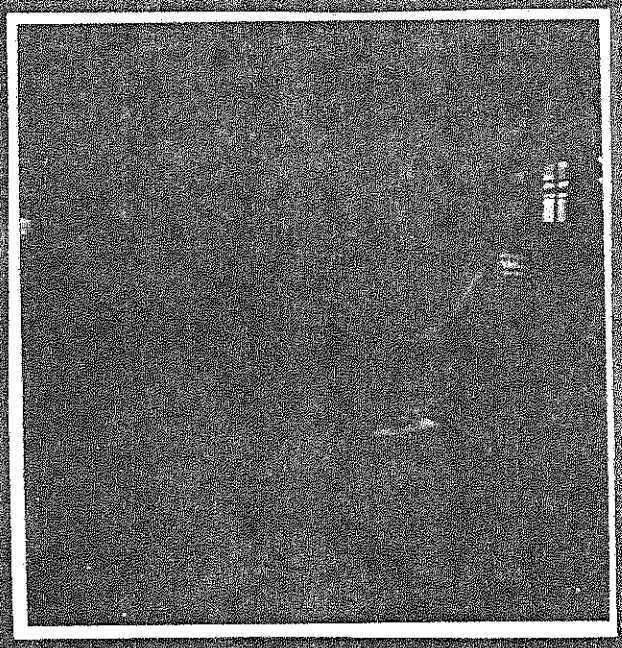


PAGE 111

STORAGE AREA B; 6/20/87 WASH

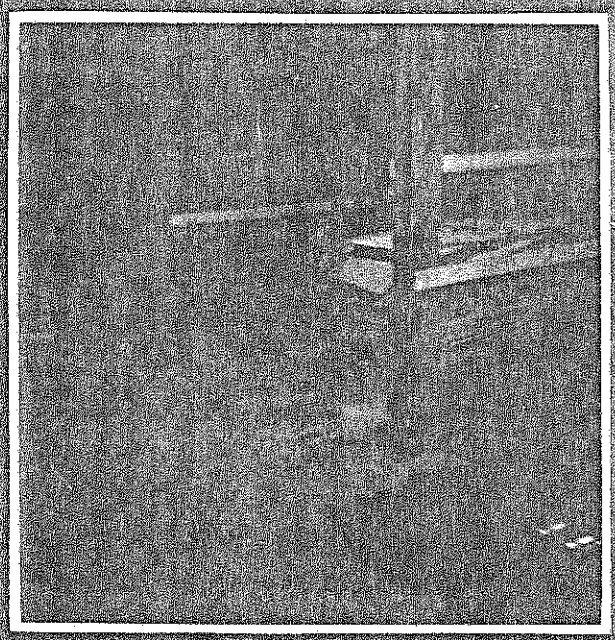


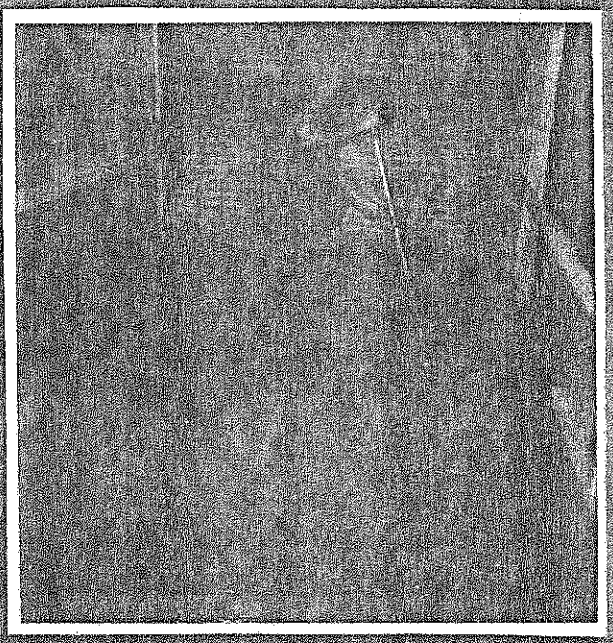


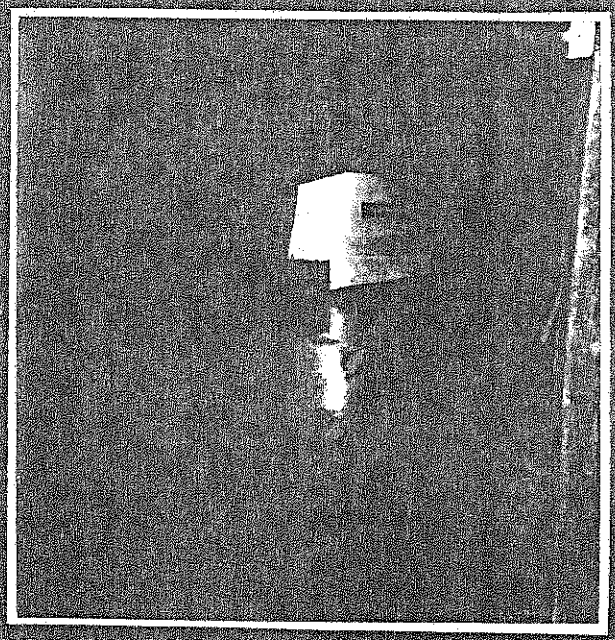


PAGE 112

STORAGE AREA B; 6/20/76 WASH







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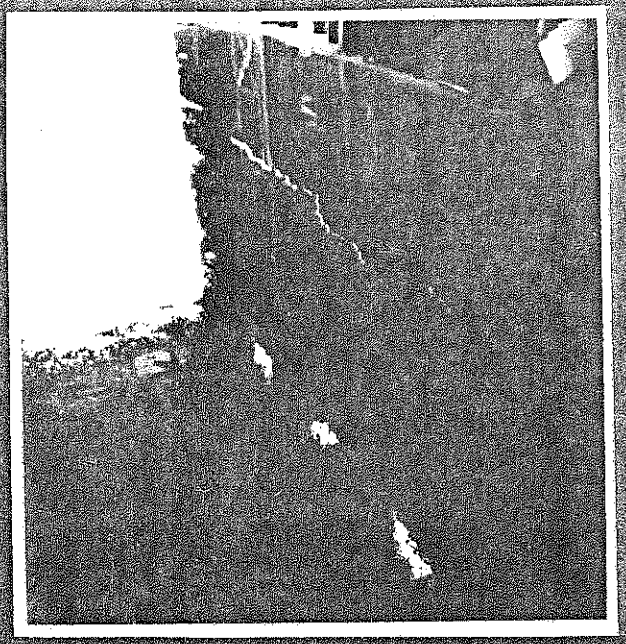
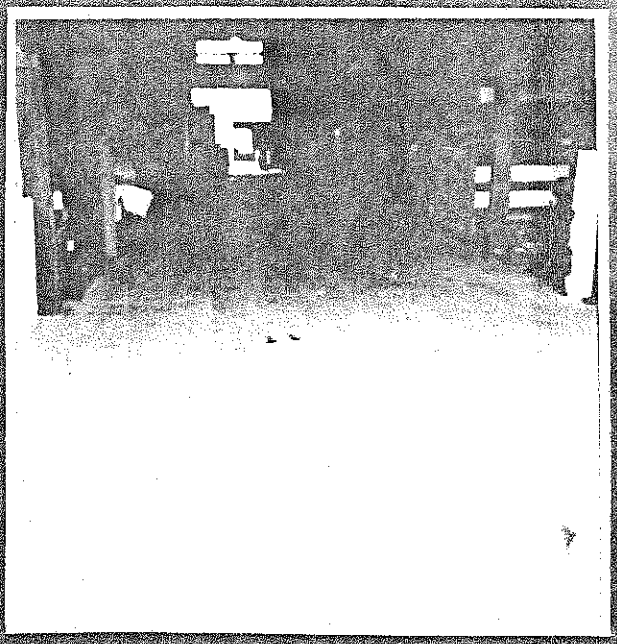
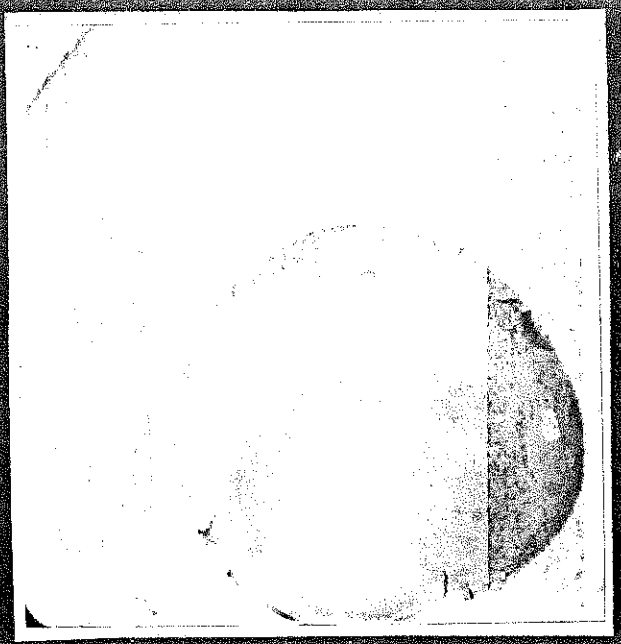
STORAGE AREA C; 6/20/87 WASH







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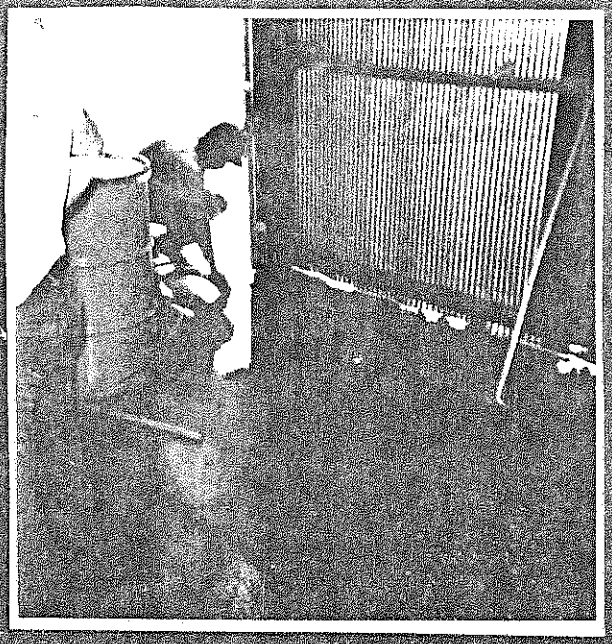
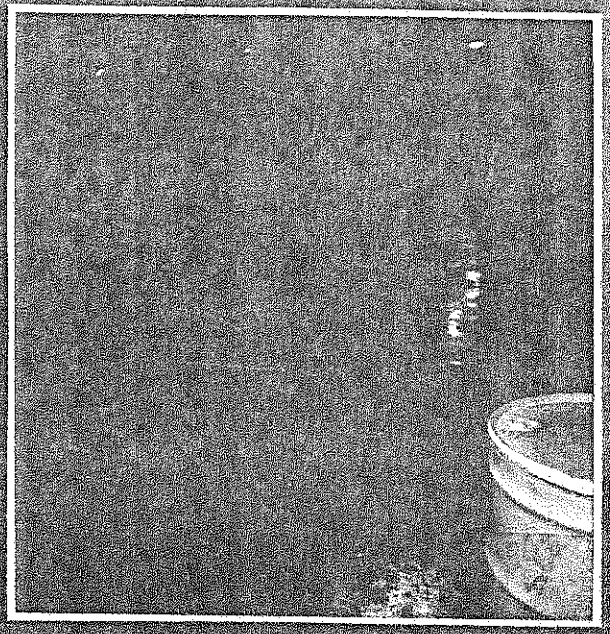
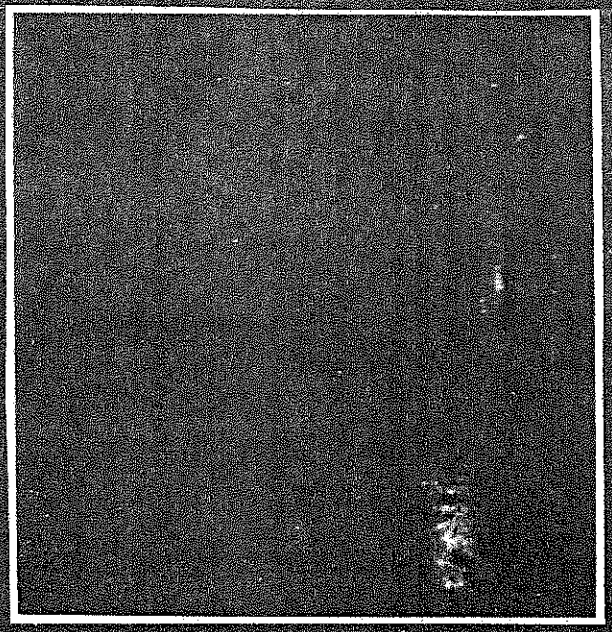
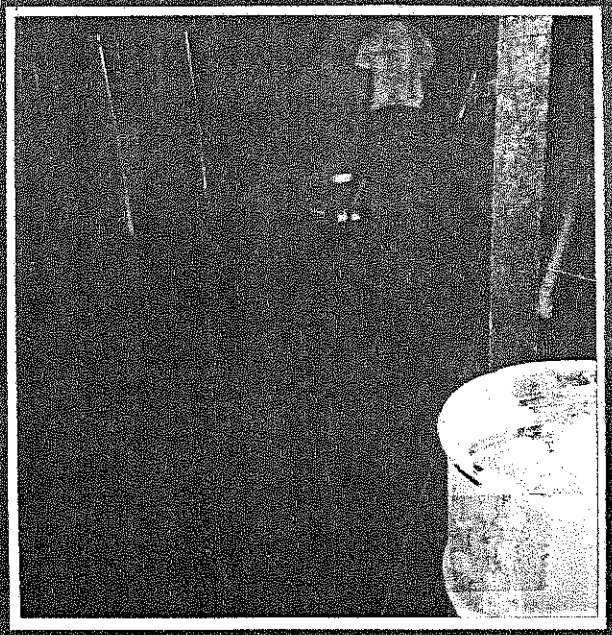
STORAGE AREA C; 6/20/87 WASH









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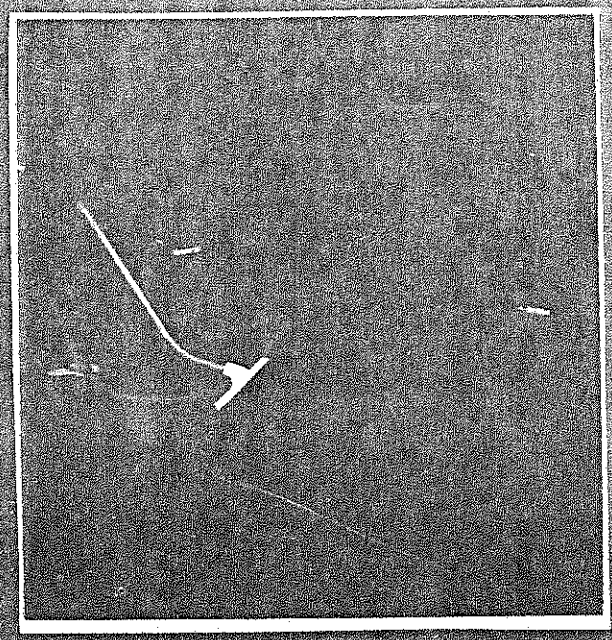
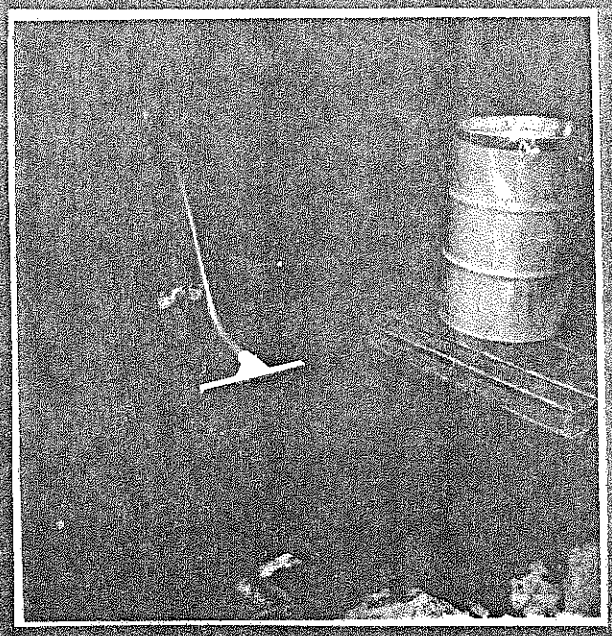
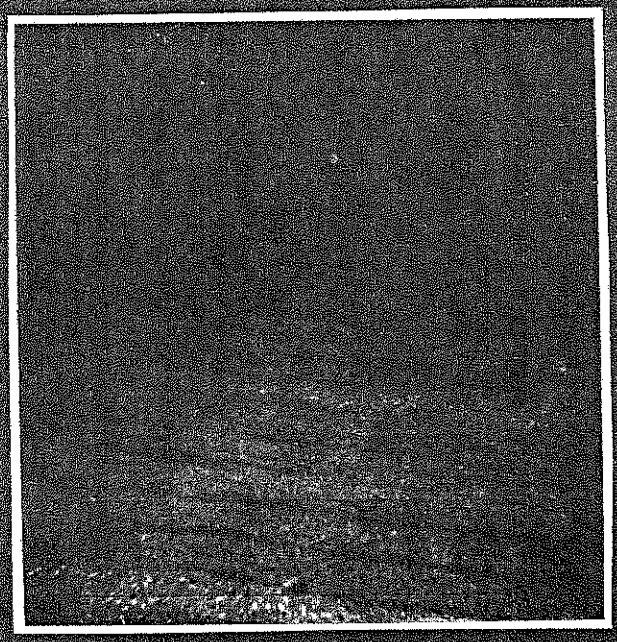
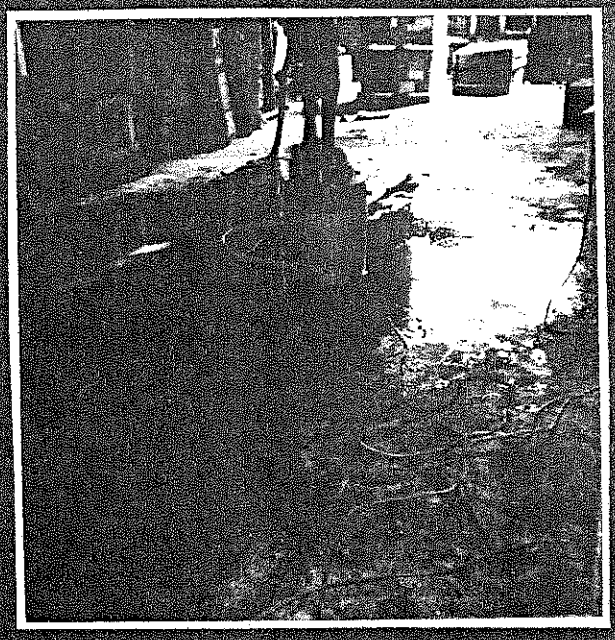
STORAGE AREA A, B, C; 7/2/87 WASH









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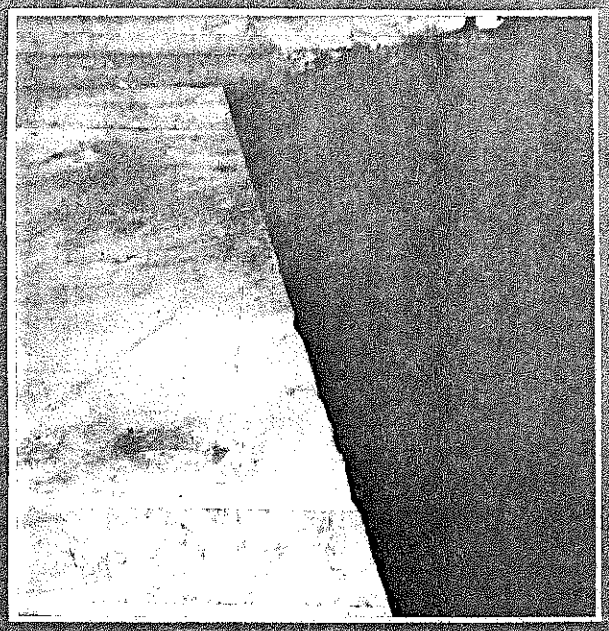
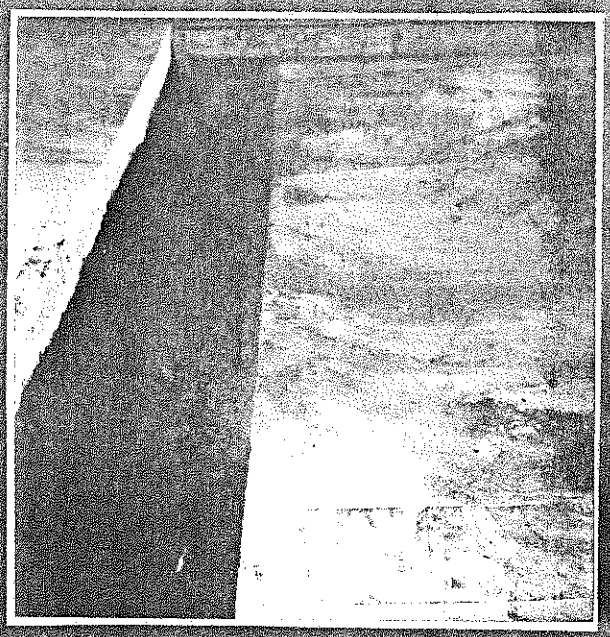
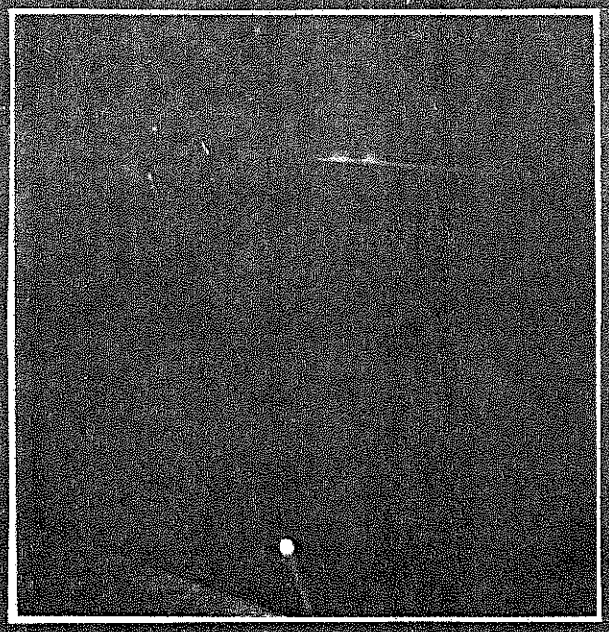
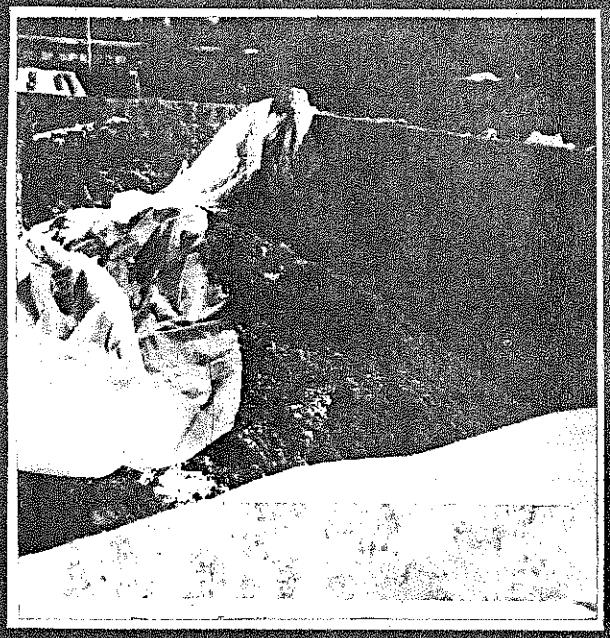
STORAGE AREA A, B, C; 8/29/87 &
9/8/87 WASH









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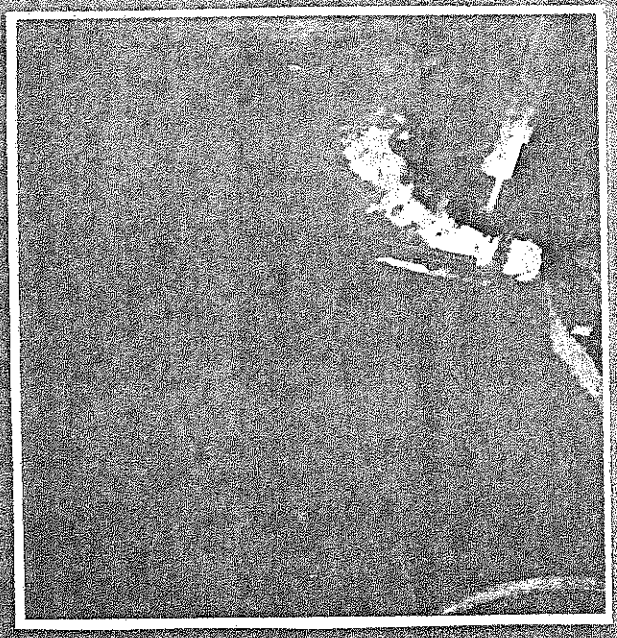
STORAGE AREA B; CONCRETE & SOIL
REMOVAL 9/9/87 & 9/30/87



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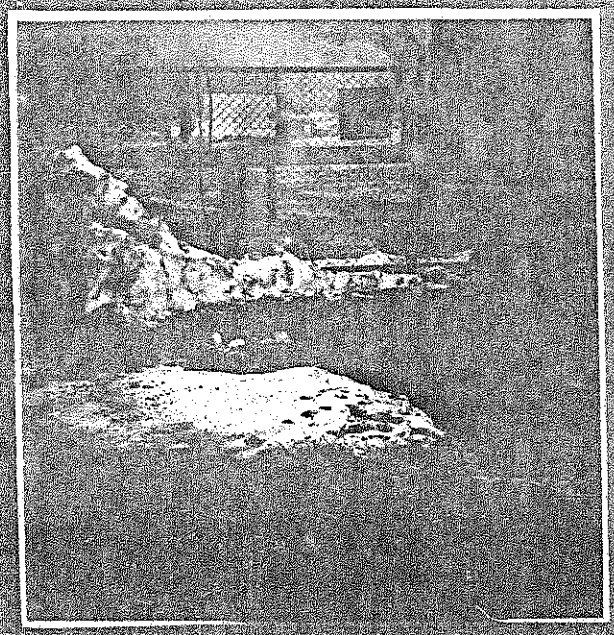
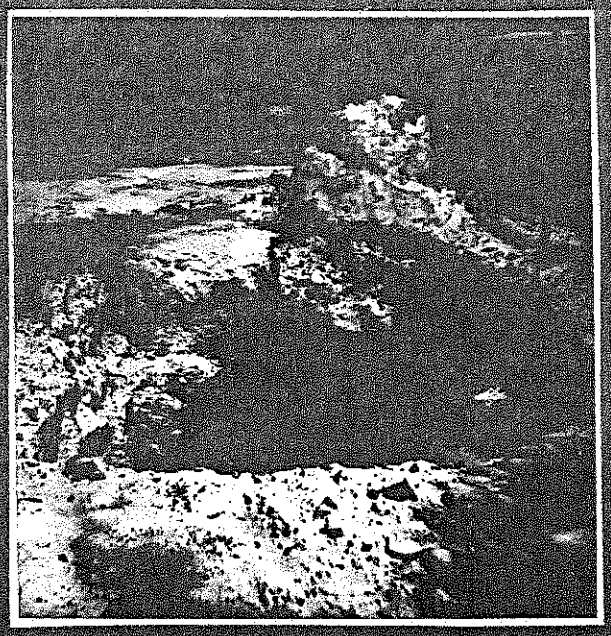
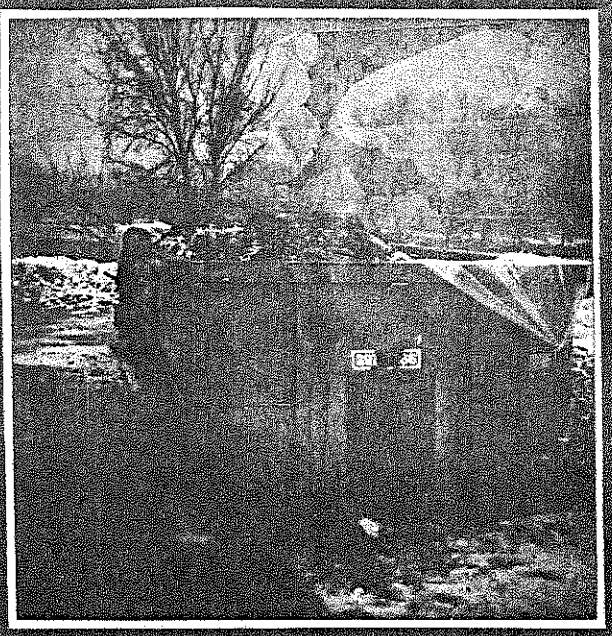
STORAGE AREA B; CONCRETE
REMOVAL EAST & WEST ENDS; 9/10/87







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STORAGE AREA D;
SOIL EXCAVATION 1/10/88

January 28, 1988

Mr. Lawrence W. Eastep
Permit Sector
Ill. Environmental Protection Agency
Div. of Land Pollution Control -- #24
2200 Chruchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Eastep:

As a result of implementing the Closure Plan for our 1300 Rock Street facility; this facility is now a large quantity (greater than 1000 kg/month) generator only.

As part of Closure Certification, please withdraw our Part A. Permit.

Also, please release our financial assurance documents as part of Closure Certification.

Very truly yours,
Barber-Colman Co.

Rodney K. Johnson

Rodney K. Johnson
Corp. Facilities Proj. Engr.

RKJ/grc

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

P418646238?

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 2010300054 -- Winnebago County
Barber-Colman Co.
ILD005145958
RCRA - Permits

May 6, 1988

Barber-Colman Co.
1300 Rock St.
Rockford, Illinois 61101

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Rockford Region
USEPA Region V

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 681

FORM 1 GENERAL — **EPA** — U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD005145958 | T/A 3 | C D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		ILL. FORM	D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP BARBER-COLMAN COMPANY ROCK STREET PLANT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 ARNE VENTERIS FACILITIES ENGR.	815 968 6833

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 1300 ROCK STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ROCKFORD	IL	61101

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1300 ROCK STREET

B. COUNTY NAME

WINNEBAGO

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 ROCKFORD	IL	61101	201

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3552 (specify) TEXTILE MACHINERY MFG.	3444 (specify) AIR DISTRIBUTION EQUIP.
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

BARBER-COLMAN COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)

P (specify)

D. PHONE (area code & no.)

A 815 968 6833

E. STREET OR P.O. BOX

1300 ROCK STREET

F. CITY OR TOWN	G. STATE	H. ZIP CODE
B ROCKFORD	IL	61101

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N IL 0003301	9 P SEE UNDER XII
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U	9 SEE UNDER XII (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
9 R	9 SEEUNDER XII (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9 A/5Q

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURING, MACHINING, DIECASTING, ASSEMBLY, PAINTING PLATING AND PACKAGING.

72090213, 03030770, 73030844, 73030847 - ALL AIR POLLUTION CONTROL PERMITS FROM STATE OF ILLINOIS.

1977 - EP-3057, LOG # 3057A-77 TREATING OF CHROME PLATING WASTE.

792413 - WASTE DISPOSAL CHROMIC ACID WASTE

792411 - " " CYANIDE PLATING "

997290 - " " OIL WASTE. F9 A/5L

997297 - " " PAINT STRIPPER.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
ROBERT E. BERCHARDT VICE PRESIDENT	Robert E. Berchardt, V.P.	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
F	I	L	D	0	0	5	1	4	5	9	5	8	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	80	01	01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
sposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S01	600	G	
X-2	T03	20	E	
1	T01	500 000	U	
2	S01	4000 000	G	
3	S01	4000 000	G	
4	S02	3000 000	G	
5	S01	9400 000	G	
6				
7				
8				
9				
10				

C DUP T/A 3 1

Should be deleted 6/30/89

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

NONE

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed** waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): S W T L D 0 0 5 1 4 5 9 5 8 T/A 3 C 1

FOR OFFICIAL USE ONLY: S W DUP T/A 2 C DUP

I. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F007	130000 0000	E Y.D.	T01	NEUTRALIZED, CONVERTED TO TRIVALENT CHROME DISPOSED OF TO POTW.
2	F007	80000000	E Y.D.	S01	
3	F007	800 000	E Y.D.	S01	
4	~~F007~~	~~5000000~~	E	S01	U.B. Delisted Waste Code.
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F I L D 0 0 4 5 1 4 5 9 5 T/A 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F 6 A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F 6 A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 15 00 32	087 05 05 53

VIII. FACILITY OWNER

X A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
BARBER-COLMAN COMPANY ROBERT E. BORCHARDT VICE PRESIDENT	Robert E. Borchardt, V.P.	11/17/80

X. OPERATOR CERTIFICATION

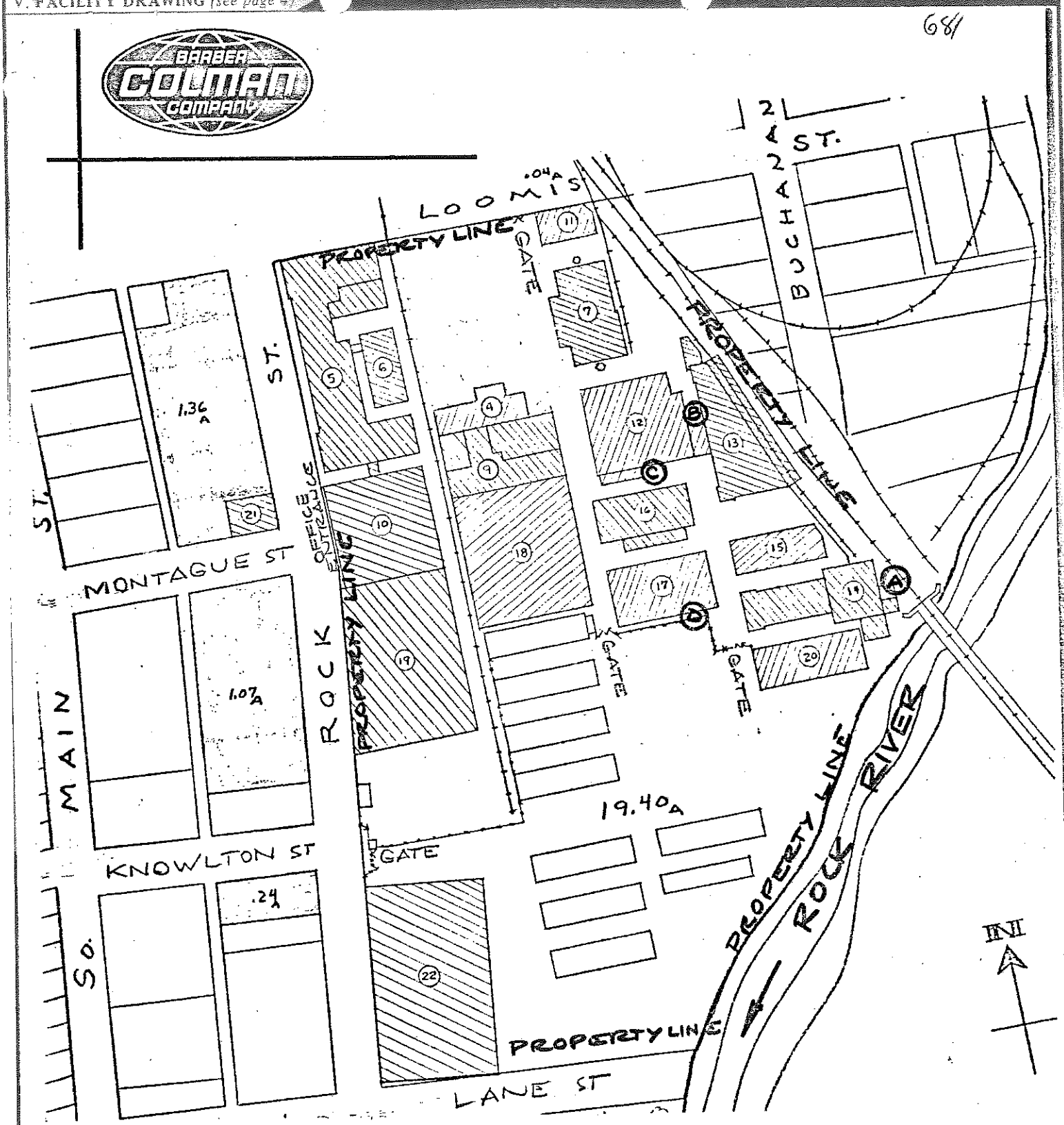
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
BARBER-COLMAN COMPANY ROBERT E. BORCHARDT VICE PRESIDENT	Robert E. Borchardt, V.P.	11/17/80

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

681



A - SPENT PLATING SOLUTION TREATMENT (IN BUILDING)
B - WASTE OIL STORAGE TANK - 3000 GAL.
C - PAINT WASTE STORAGE 10'X10'
D - PLATING WASTE STORAGE 10'X30'

ROCK STREET PLANT

SCALE 1"=200'

Barber-Colman Company

1300 Rock Street, Rockford, Illinois U.S.A. 61101 Phone: 815/968-6833 Teletype: 815/962-2420 Telex: 25-7413 Cable: BARCOL

INFO UNIT,
PLEASE FILE

ILD 005 195 958
ILD 048 968

BARBER COLMAN COMPANY

November 11, 1986

RECEIVED
DEC 01 1986
U.S. EPA, REGION V

RECEIVED
NOV 19 1986
SOLID WASTE SECTION
U.S. EPA, REGION V

U.S.E.P.A.
Region V
230 South Dearborne St.
Chicago, Il 60604

Dear Sir:

Please add corrected pages 2 and 3 to R.C.R.A. Emergency Contingency Plans for Barber Colman's 1351 Windsor Road and 1300 Rock Street Facilities. Swedish American's Emergency Room phone number is 968-4400 instead of 968-4800; pg. 2 both plans. Rockford E.S.D.A. coordinator is Fred Cornell, phone number (815) 987-5568; pg. 3 Rock Street Plan. Winnebago County E.S.D.A. coordinator is Tom Cancelose at phone number (815) 987-5990; pg. 3 Windsor Road Plan. Thank you.

Sincerely,

Rod K. Johnson

Rod K. Johnson

Barber-Colman Company
CORPORATE OFFICES
555 Colman Center Drive
P.O. Box 7040
Rockford, IL U.S.A. 61125-7040
Phone: (815) 397-7400
Teletype: 25-7417
Cable: BARCOL

RCRA EMERGENCY/CONTINGENCY PLAN

Company Barber-Colman Company
Addr 555 Colman Center Drive, Rockford, IL. 61125 -7040
Location of Facility 1300 Rock Street
City Rockford State IL. Zip 61105-1240
Telephone (815) 968-6833 EPA # ILD005145458
Primary Emergency Coordinator LARRY HENERT Address 5846 FAIR OAK DR, DAVIS JCT.,
Telephone (Office) (815) 968-0660 ext. 2614 (Home) (815) 383-4450
Secondary Emer. Coordinator DAROLD BRISTOL Address 1016 RAMONA TERRACE
Telephone (Office) (815) 968-0660 ext. 2614 (Home) (815) 633-8733
Secondary Emr. Coordinator RODNEY K. JOHNSON Address 4939 Pepper Drive Rfd, IL. 61111
Telephone (Office) (815) 397-7400 ext. 6255 (Home) (815) 877-0844

Description of Waste Handled DOT CLASSIFCATION	VOLUME ON-SITE	# OF DRUMS	DOT ID. NUMBER	DOT EMERG. GUIDE #	EPA WASTE CODE
1,1,1 TRICHLOROTHANE	110 gal.	2	UN 2831	55	
ZINC CHLORIDE	550 gal.	10	UN 1831	60	
LIQUID COPPER CYANIDE	220 gal.	4	UN 1587	53	
CAUSTIC BLACK OXIDE	110 gal.	2			
NICKEL CHLORIDE SULFATE	165 gal.	3	NA 9139	31	
CAUSTIC CLEANER SLUDGE	550 gal.	10	UN 1824	60	
SOLID CYANIDE HT/TRT SALTS	165 gal.	3	UN 1588	55	PO 30
ZINC FILTER	110 gal.	2			
NICKEL FILTERS	110 gal.	2			
MISC. TRENCH SLUDGE	165 gal.	3			
CHROMIC ACID	55 gal.	1	UN 1755	60	
	2200 gal.				

Federal, State & Local Emergency Response Contacts

Organization	Contact & Location	Phone
LOCAL		
Primary Fire Dept. Rockford Fire Dept.	204 1st Avenue Rockford, IL.	(815) 964-3321
Rockford Sanitary Dist.	(815) 397-9422	
~~Secondary Fire Dept.~~ Rockford Police Dept.	400 West State St. Rockford. IL.	(815) 987-5800
Ambulance Service Emergency Paramedic Ambulance		(815) 964-3321
Emergency Response Team		
Sheriff's Dept. Winnebago County Sheriff - 400 West State St. Rockford. IL.		(815) 987-5800
Local State Police Ill. State Police 16450 W. State Rd. Pecatonica, IL.		(815) 963-7687
Primary Hospital Emergency Room - Swedish American - 1400 Charles St. Rkfd		(815) 968-4400
Secondary Hospital Emergency Room - Rockford Memorial - 2400 N. Rockton, Rkfd		(815) 968-6861
Secondary Hospital Emergency Room - St. Anthony's - 5666 E. State St. Rfd.		(815) 226-2000
STATE		
State Police Hdqrs. Hazardous Mtl. Req. Enforcement, ILL. State Police		(217) 782-7762
State Environmental Hdqrs. Ill. Env. Protection Agency, 2200 Churchill Rd. Springfield, IL. 62706		
State Emergency Response Ill. EPA Emergency Response, 2200 Churchill Rd. Springfield, IL.		(217) 785-2800 (217) 782-3637
FEDERAL		
Near EPA Office US EPA - Region V, 230 South Dearborn St. Chicago, IL. 60604		(312) 353-2000
Nearest BMCS Office		
~~US EPA Emergency Spill Reporting~~		800-424-8802

U.S. COAST GUARD NATIONAL RESPONSE CENTER	CHEMTREC—EMERGENCY RESPONSE	POISON CENTER
800-424-8802	800-424-9300	(815) 968-6000 1400 Charles St. Rockford, IL. 1-800-322-5330 (Peoria)

rangements with Local Police (Describe)

1. To identify location of accidental spill on public/private property.
2. To indicate type of material accidentally spilled.
3. Request security so spill can be safely contained and cleaned up.

Arrangements with Local Fire Departments (Describe)

1. To identify location of accidental spill on public/private property.
2. To identify type of material accidentally spilled.
3. Determine whether or not this will pose a fire hazard.

Arrangements with Local Hospitals (Describe)

1. To alert emergency rooms that an accidental spill has occurred and type of material.
2. To indicate whether or not if persons have been exposed to spilled material.

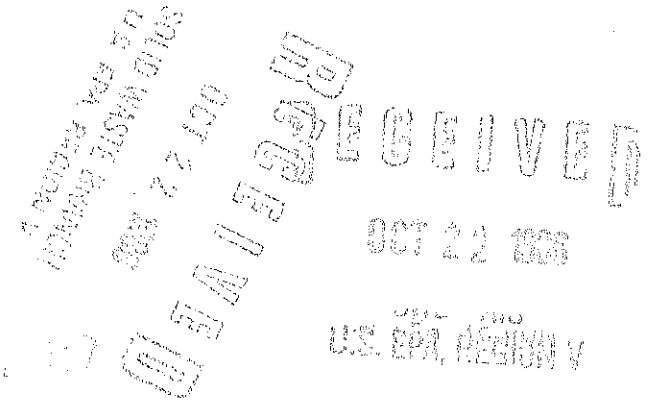
Arrangements with Local or State Emergency Response Services (Describe)

1. To call if accidental spill has occurred.
2. To inform size and nature of spill.
3. To inform what clean up arrangements will be made.

Hospital Emergency Info:	Hospital Equipment Requirements
Swedish American Hospital 1400 Charles St. Rockford, IL. (815-968-4800)	Require a list of toxic materials used at Barber-Colman Co.
St. Anthony's Hospital 5666 E. State St. Rockford, IL. (815) 226-2000	Require a copy of our Emergency Contingency Plan and a list of toxic materials used at Barber-Colman Co.
Rockford Memorial Hospital 2400 N. Rockton Ave. Rockford, IL. (815) 968-6861	Require a list of toxic materials used at Barber-Colman & Copy of Emergency Contingency Plan.
Fire Police Emergency Information	**Emergency Equipment & Service Required**
Fred Cornell, E.S.D.A. Coordinator (815) 987-5568	Require a copy of our Emergency/Contingency Plan.
State of IL. Hazardous Mat'l. Section, Dept. Law Enforcement, 401 Armory Bldg. Springfield, IL. 62706 PH. (217) 782-7762	Require that we have soda ash or Lime to neutralize acid spills. Require that we have drums for containing clean up material from spills. Require copy of Emergency/Contingency Plan.

October 17, 1986

U.S.E.P.A.
Region V
230 South Dearborne St.
Chicago, IL 60604



Dear Sir:

I have enclosed current R.C.R.A. Emergency Contingency Plans for Barber Colman's Manufacturing operations at the 1351 Windsor Road, Loves Park Facility and the 1300 Rock— Street, Rockford Facility on lease by Barber Colman from Reed Chatwood, Inc.

Please send me a short note verifying receipt and file of this plan. A copy of your letter will satisfy future E.P.A. inspection requirements.

Very truly yours,

Rod K. Johnson

Rod K. Johnson
Corp. Services Plant Engineer

BARBER COLMAN CO.
1300 ROCK ST.

vision: #1
Date: 11-25-85

To Reflect New Ownership
of Rock St. Plant & B-C
Responsibility for Plating
Heat Treat.

RCRA
EMERGENCY/CONTINGENCY PLAN

BARBER COLMAN ROCK STREET PLATING & HEAT TREAT FACILITY

COPY FOR: (NAME) Larry Henert
(TITLE) Plant Engineer
(ORG.) Edgar W. Terneus- Facility Services Manager
(ADDRESS) P.O. Box 1240 -
(CITY) Rockford (STATE) IL. (ZIP) 61105-1240
(PHONE) (815) 397-7400

RCRA CONTINGENCY/EMERGENCY PLAN

TABLE OF CONTENTS

References: 40 CFR Parts 260/261

RCRA EMERGENCY/CONTINGENCY PLAN

Company Barber-Colman Company
Address 555 Colman Center Drive, Rockford, IL. 61125 -7040
Location of Facility 1300 Rock Street
City Rockford State IL. Zip 61105-1240
Telephone (815) 968-6833 EPA # ILD005145458
Primary Emergency Coordinator LARRY HENERT Address 5846 FAIR OAK DR, DAVIS JCT.
Telephone (Office) (815) 968-0660 ext. 2614 (Home) (815) 383-4450
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Telephone (Office) (815) 968-0660 ext. 2614 (Home) (815) 633-8733
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Telephone (Office) (815) 397-7400 ext. 6255 (Home) (815) 877-0844

Description of Waste Handled

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Secondary Hospital Emergency Room - St. Anthony's	5666 E. State St. Rfd.	(815) 226-2000
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Nearest EPA Office US EPA - Region V,	230 South Dearborn St. Chicago, IL. 60604	(312) 353-2000
Nearest BMCS Office		
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800-424-8802	800-424-9300	(815) 968-6000 1400 Charles St. Rockford, IL.
		1-800-322-5330 (Peoria)

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1. To identify location of accidental spill on public/private property.
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Rockford Memorial Hospital 2400 N. Rockton Ave. Rockford, IL. (815) 968-6861	Require a list of toxic materials used at Barber-Colman & Copy of Emergency Contingency Plan.
Fire Police Emergency Information	**Emergency Equipment & Service Required**
Wayne E. Jones ESDA Coordinator (815) 987-5783	Require a copy of our Emergency/Contingency Plan.
State of IL. Hazardous Mat'l. Section, Dept. Law Enforcement, 401 Armory Bldg. Springfield, IL. 62706 PH. (217) 782-7762	Require that we have soda ash or Lime to neutralize acid spills. Require that we have drums for containing clean up material from spills. Require copy of Emergency/Contingency Plan.

MARY EMERGENCY COORDINATOR (if on duty)
Name LARRY HENERT Title FORMAN Office Phone (815) 968-0660 ext. 2614
Address 5846 FAIR OAK DR, DAVIS JCT. Home Phone (815) 393-4450
Functions/Activities during Emergency (Describe in detail):

1. To make survey of spill.
2. To initiate containment and then clean up.
3. To alert public and company authorities.

A. Public	B. Company
Police	Security Manager
Fire	Safety Manager
Hospital	Facilities Services Manager

SECONDARY EMERGENCY COORDINATOR (if on duty)
Name Darold Bristol Title LEAD OPERATOR Office Phone (815) 968-0660 ext. 2614
Address 1016 Ramona Terrace, Rockford, IL 61111 Home Phone (815) 633-8733
Functions/Activities during Emergency (Describe in detail):

To act as primary emergency coordinator (P.E.O.) when P.E.O. is out of plant.

SECONDARY EMERGENCY COORDINATOR:
Name Rodney K. Johnson Title Facility Serv. Eng. Office Phone (815)
Address 4939 Pepper Drive - Rockford, IL. Home Phone (815) 877-0844
Functions/Activities during Emergency (Describe in detail):

1. To act as primary emergency coordinator P.E. O. when P.E.O. and 1st secondary emergency coordinator are out of plant.

Job Function: PRIMARY EMERGENCY COORDINATOR Name Larry Henert

Emergency Responsibilities/Activities (Describe in Detail)

1. To make a survey of the spill.
2. To initiate containment and clean up.
3. To alert public and company authorities.

A. Public	B. Company
Police	Security Manager
Fire	Safety Manager
Hospital	Facilities Service Manager

Job Function: SECONDARY EMERGENCY COORDINATOR Name Darold Bristol

Emergency Responsibilities/Activities (Describe in Detail):

In the absence of the Primary Emergency Coordinator the Secondary Emergency Coordinator will perform the duties of the Primary Emergency Coordinator.

1. Make a survey of the spill.
2. Initiate containment and clean up the spill.
3. Alert public and company authorities.

A. Public	B. Company
Police	Security Manager
Fire	Safety Manager
Hospital	Facilities Service Manager

Job Function: Secondary Emergency Coordinator Name Rodney K. Johnson

Emergency Responsibilities/Activities (Describe in Detail):

In the absence of the Primary Emergency Coordinator and the Secondary Emergency Coordinator the Secondary Emergency Coordinator will perform the duties of the Primary Emergency Coordinator.

1. Make a survey of the spill.
2. Initiate containment and clean up the spill.
3. Alert public and company authorities.

A. Public	B. Company
Police	Security Manager
Fire	Safety Manager
Hospital	Facilities Service Manager

Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail)

Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail):

Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail):

Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail)

Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail):

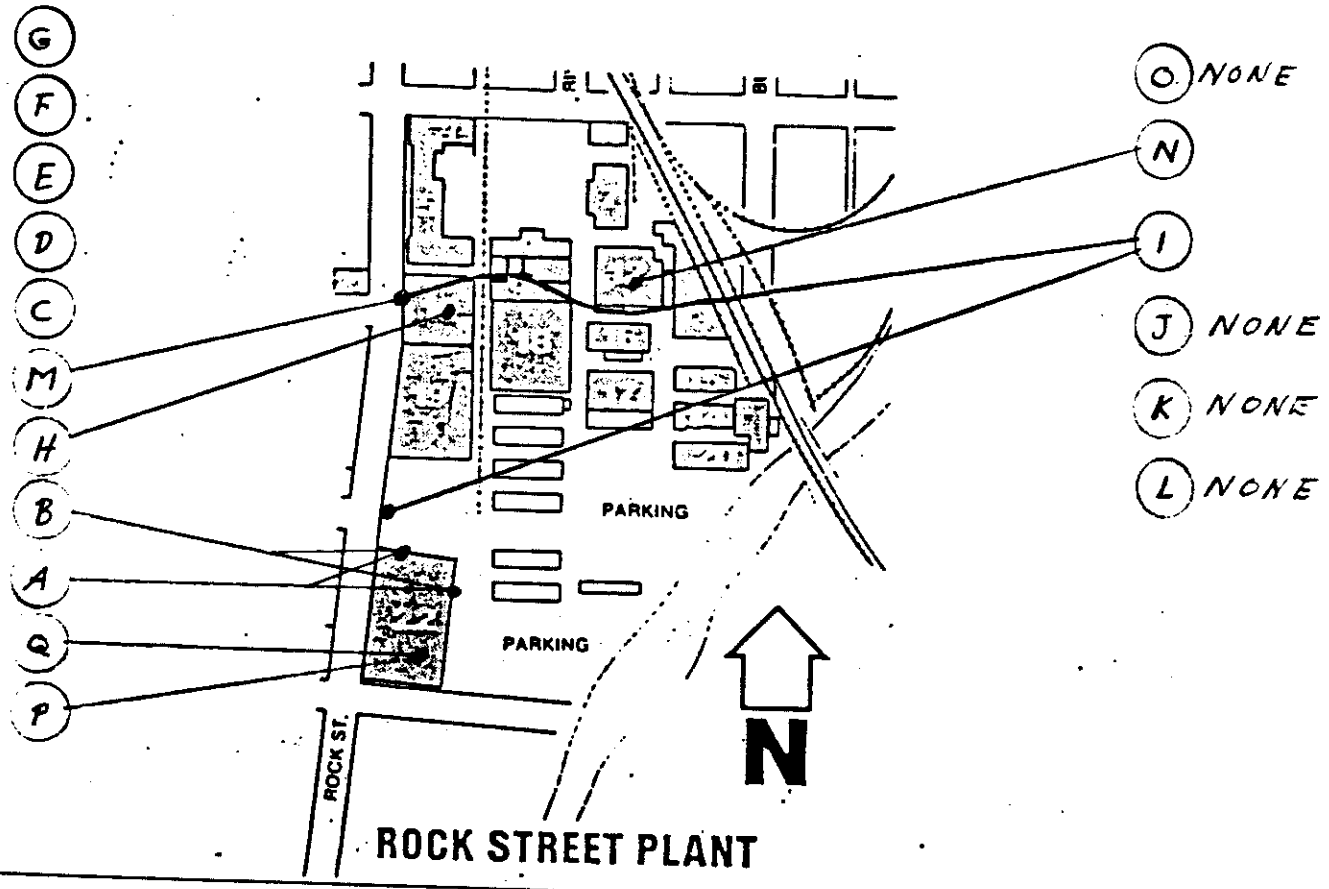
Job Function: _____ Name _____
Emergency Responsibilities/Activities (Describe in Detail):

Facility Location	1300 Rock Street Rockford, IL.	Facility #	Metal Storage Bldg. At Rock Street Plant Sec. 22

Facility Description

Metal Storage Building Sec. 22
One Floor
Black Top Floor

Facility Diagram (Identify location of individual emergency equipment, etc.)



Legend:

a. Entrances
b. Emergency Exits
c. Fire Extinguishing Systems
d. Spill Control Equipment
e. Communication Systems/Speakers
f. Fire Alarm Systems/Sirens/Bells
g. Decontamination Equipment
h. First Aid Stations
i. Guard Gates/Stations
j. Emergency Equipment Locations
k. Eye Wash Stations
l. Fire Fighting Equipt. (Vehicular)
m. Fire Extinguishers
n. Emergency Respirators
o. Monitoring Equipment
p. Waste Storage Area
q. Hazardous Materials Storage Area

Instructions: Describe the Physical Characteristics and Capabilities of each of the following, if they are present in the facility

Metal Storage Building Sec. 22
One Floor Black Top Floor

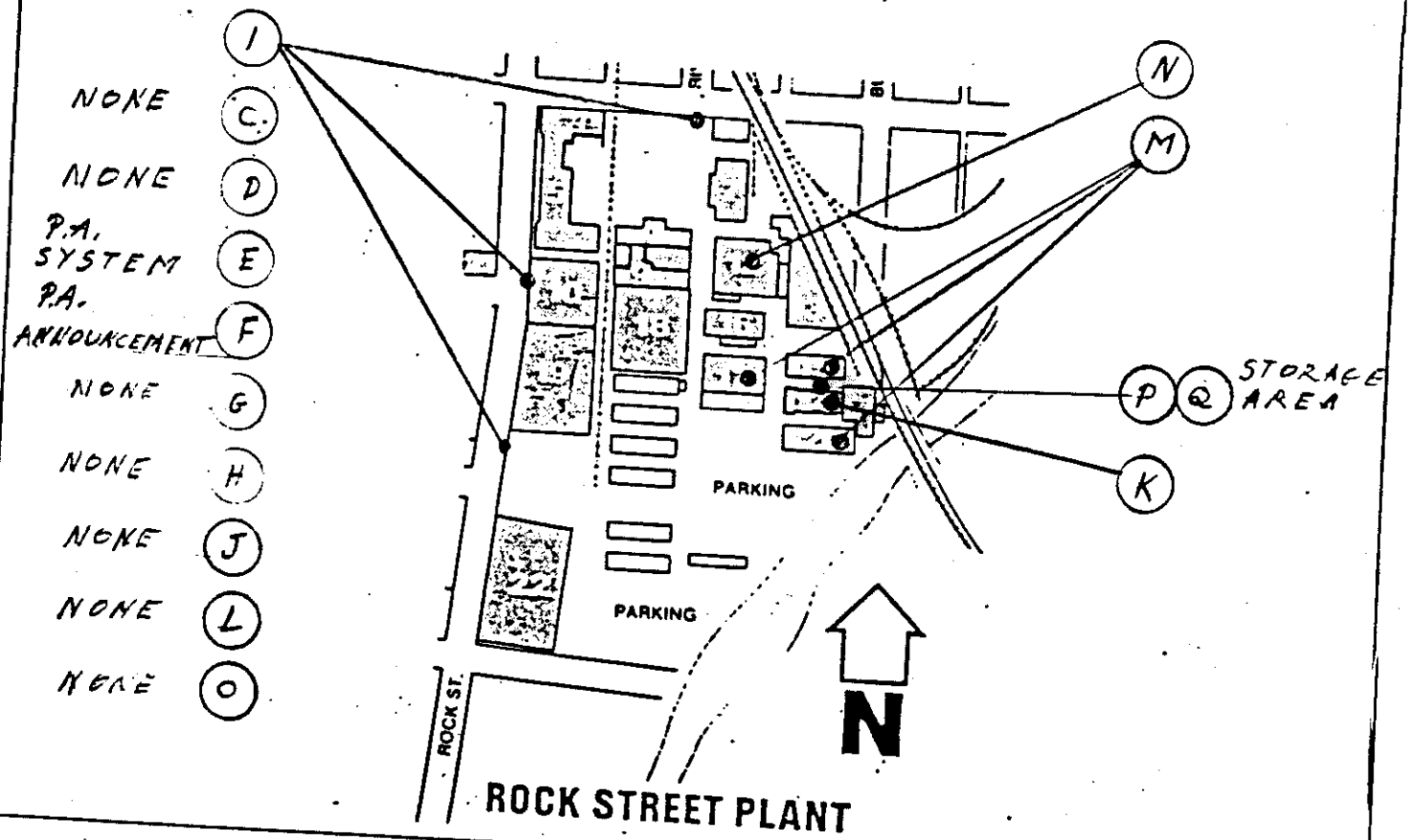
a. Entrances Walk in Doors One East One North	h. First Aid Stations First Aid Nurse on Duty 1st Shift. First Aid Attendant 2nd and 3rd Shifts.	o. Monitoring Equipment None
b. Emergency Exits Walk in Doors One East One North	i. Guard Gates/Stations Knowlton Street Plant Entrance. Main Gate Guard Entrance.	p. Waste Storage Area Metal Storage Building Black Top Floor
c. Fire Extinguishing System None	j. Emergency Equipment locations None	q. Hazardous Materials Storage Area Metal Storage Building Black Top Floor
d. Spill Control Equipment Lime for Neutralizing acid spills. Drums for containing clean up material from spill.	k. Eye Wash Stations None	r. Other None
e. Communication System/ Speakers None	l. Fire Fighting Equip. (Vehicular) None	
f. Fire Alarm System/Alarms None	m. Fire Extinguishers At Guard Gate	s. Other None
g. Decontamination Equipment lone	n. Emergency Respirators Maintenance Plant Emergency Organization	

Facility Location	1300 Rock Street Rockford, IL.	Facility #	lean to: Between Building 14 and Building 15 in the Covered Area

Facility Description

The Covered Area Between Building 17 and Building 15

Facility Diagram (Identify location of individual emergency equipment, etc.)



Legend:

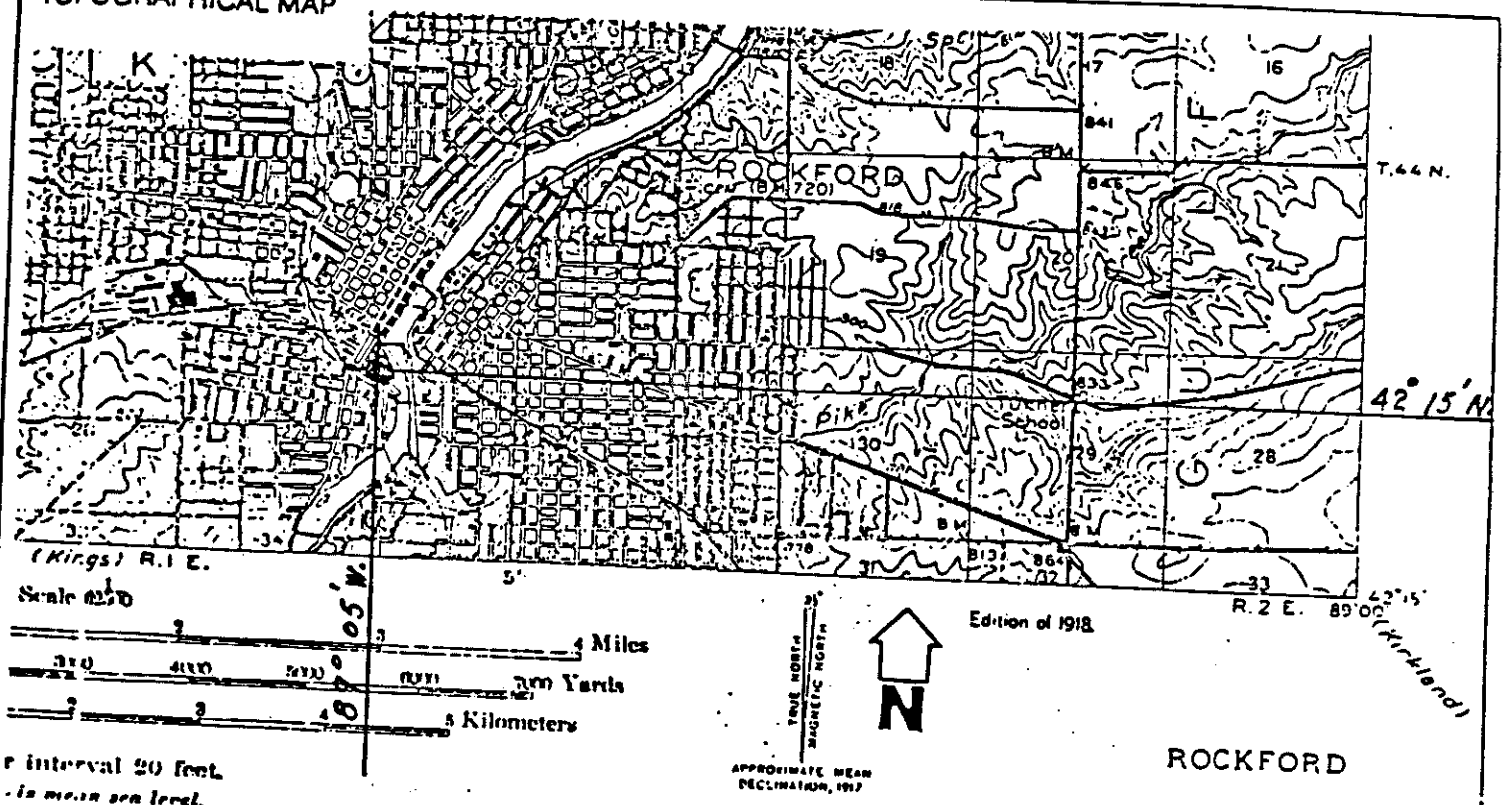
a. Entrances
b. Emergency Exits
c. Fire Extinguishing Systems
d. Spill Control Equipment
e. Communication Systems/Speakers
f. Fire Alarm Systems/Sirens/Bells
g. Decontamination Equipment
h. First Aid Stations
i. Guard Gates/Stations
j. Emergency Equipment Locations
k. Eye Wash Stations
l. Fire Fighting Equipt. (Vehicular)
m. Fire Extinguishers
n. Emergency Respirators
o. Monitoring Equipment
p. Waste Storage Area
q. Hazardous Materials Storage Area

Instructions: Describe the Physical Characteristics and Capabilities of each of the following, if they are present in the facility

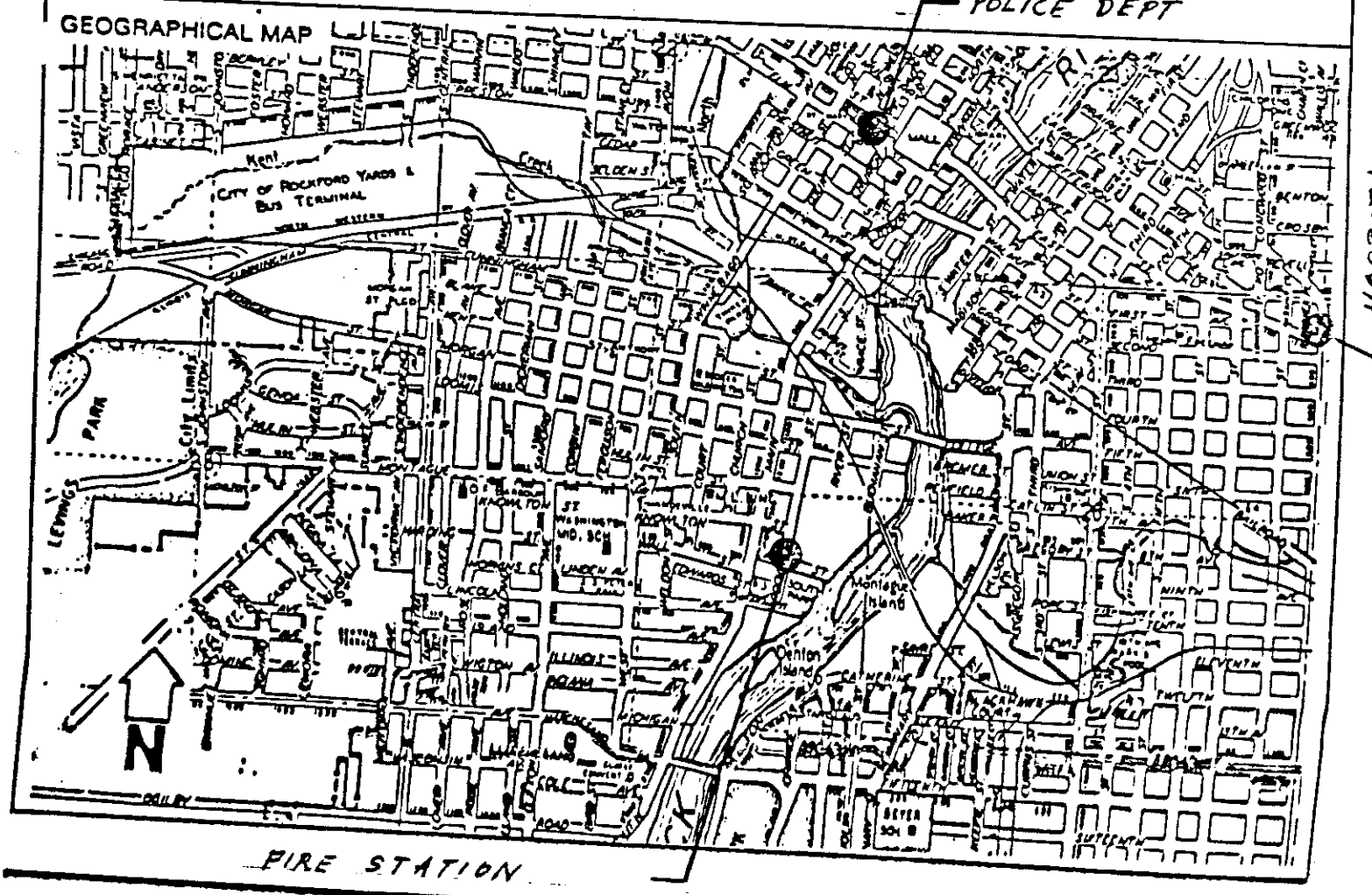
Covered Area Between Building 15 and Building 17

a. Entrances Walk in Door West Side	h. First Aid Stations First Aid Nurse on Duty 1st Shift. First Aid Attendants 2nd and 3rd Shifts.	o. Monitoring Equipment None
b. Emergency Exits Walk In Door West Side	i. Guard Gates/Stations Knowlton Street Main Guard Station Loomis Street	p. Waste Storage Area Between Building 15 and Building 17
c. Fire Extinguishing System None	j. Emergency Equipment locations None	q. Hazardous Materials Storage Area Between Building 15 and Building 17
d. Spill Control Equipment Soda ash for neutralizing acid spills. Drums for containing clean up material from spills.	k. Eye Wash Stations In Bldg. 17 - Plating Dept.	r. Other None
e. Communication System/ Speakers P.A. System	l. Fire Fighting Equip. (Vehicular) None	
f. Fire Alarm System/Alarms P.A. System	m. Fire Extinguishers In Building 14, 15, and 17.	s. Other None
g. Decontamination Equipment None	n. Emergency Respirators Section 12	

TOPOGRAPHICAL MAP



GEOGRAPHICAL MAP



TOPOGRAPHICAL MAP (Provide a description or information)

Flow of Surface Waters: South East to Rock River

Facility Location & Parameters:

North Loomis St., West - Rock St., South - Lane St., South East - Rock River, East - I.C. Railroad Tracks 42° 15' N. Lat. 89° 05' W. Long.

Underground Water Systems or Wells

Deep Well East of Sec. 7

Artificial or Natural Facility Barriers

None

Unauthorized Personnel Sign Locations

Property Posted and Fenced.

Other Information:

Security Guards on Duty 24 Hours a Day 7 Days a Week.

GEOGRAPHICAL MAP (Provide a description or information)

Primary Evacuation Routes

Any City Street North, South or West.

Secondary Evacuation Routes

Same as Primary Evacuation Routes.

Alternate Evacuations Routes

Same as Primary Evacuation Routes.

Signals to be used for each Evacuation Plan

Announcement on P.A. System

Location of Local Fire/Police/Hospital Facilities (If possible)

Fire Dept. 1520 South Main St. Rockford, IL.
Police Dept. 420 West State St. Rockford, IL.

The Following List of Raw Materials Used at Barber-Colman Are Not Presently Hazardous Waste. They Are Listed Because in an Emergency Situation They Could Become a Problem.

Sulphuric Acid			UN 1830	39	U103
Cyanide			UN 1588	55	F008
Chromic Acid			NA 1755	60	U032
Hydrocloric Acid			NA 1789	60	P063
Nitric Acid			NA 1760	60	F009
Phosphoric Acid			UN 1805	60	P041
Acetic Acid			UN 2790	29	U112
Nickel Chloride			NA 9139	31	F009
Nickel Sulfate			NA 9141	31	F009

RCRA CONTINGENCY PLAN

The Environmental Protection Agency requires each generator, person or company who stores hazardous waste at any site in the United States, to prepare and maintain a RCRA CONTINGENCY PLAN which will be made available to all employees and Emergency Response Personnel in local organizations. (i.e. Fire, Police and Hospital personnel and emergency response teams).

The requirement for each generator to prepare a RCRA Contingency Plan is outlined in Section 262.34 in STANDARDS FOR GENERATORS OF HAZARDOUS WASTES. Each generator must comply with the requirements for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, outlined in Subpart C - PREPARDNESS & PREVENTION...and Subpart D - CONTINGENCY PLAN & EMERGENCY PROCEDURES.

When preparing a RCRA CONTINGENCY PLAN, the generator would be required to provide the following information, based on the hazardous waste stored at the generator's facility or plant. Using the RCRA Contingency Plan included in this booklet, we will cover the required and optional information that will allow emergency response personnel to properly handle any accidental release of hazardous waste at the generator's facility or plant.

RCRA EMERGENCY/CONTINGENCY PLAN - PAGE #2

1. Company name, address, city, state and zip.
2. Telephone number and EPA Identification number.

3. List the Primary Emergency Coordinator, his or her address and office/home telephone numbers.

4. If additional personnel are assigned as alternate or secondary Emergency Coordinators, list their names, addresses and office/home telephone numbers.

5. Description of Hazardous Waste handled or stored on-site: (OPTIONAL)

   a. DOT Classification or Proper shipping name.

   b. Volume stored on site (Average).

   c. Monthly amount generated.

   d. DOT I.D. Number for the hazardous waste.

   e. DOT Emergency Guide Number.

   f. EPA Waste Code Number. (if any)

6. Federal, State & Local Emergency Response Contacts. (265.52(c))

   The regulations require each generator to describe the arrangements with all Emergency Response teams or agencies relative to any emergency involving the generator's hazardous waste. This section would show the emergency response organization, the contact, location and telephone number.

ARRANGEMENTS WITH POLICE, FIRE, CONTRACTOR, HOSPITAL AND EMERGENCY RESPONSE PERSONNEL - PAGE #3 (265.52(c))

Page #3 provides the required information relative to the arrangements each generator has made with local and state emergency response personnel or with local police, fire or hospital personnel. Describe each agreed-upon arrangement with there agencies.

PRIMARY/SECONDARY EMERGENCY COORDINATOR'S RESPONSIBILITIES - Page #4 - (OPTIONAL)

Page #4 allows the plan to outline and describe the Emergency Coordinator's functions or activities, in the event an emergency takes place. If emergency responsibilities are divided between Primary or Secondary Emergency Coordinators, use this page to describe those responsibilities.

JOB DESCRIPTION/FUNCTION EMERGENCY RESPONSIBILITIES - PAGES #5/6/7 (OPTIONAL)

Pages #5, 6 and 7 provide information on specific employees who have been assigned responsibilities in the event of an emergency involving hazardous waste. Their responsibilities, duties or activities may be outlined on these pages.

FACILITY EMERGENCY EQUIPMENT ON-SITE - Pages #8/9 - (265.52(e))

Page #8 provides the required information on the types and locations of safety or emergency equipment. The location of this equipment can be contained within a diagram of the plant.

Page #9 provides the required information on the physical characteristics and capabilities of all safety and emergency equipment on-site.

TOPOGRAPHICAL/GEOGRAPHICAL MAPS/DIAGRAMS IF FACILITY Pages #10/11 (265.52(f))

Page #10 provides the topographical map or diagram of the facility or plant showing the facility and it's boundries.

Page #11 provides a description of the characteristics of the facility and it's surrounding areas...and a description of the primary and secondary evacuation routes to be used in an emergency.

Remember, once the RCRA Contingency Plan has been completed, copies must be provided to all state and local agencies who would be involved in assisting the generator, in the event of any emergency or the accidental release or spill of the generator's hazardous waste.

C.2 Compliance/ Enforcement

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005145958 | IEPA #: 2010300054
Facility Name: Barber Colman-CMF (Colmagn Metal Finishing) | Phone #: 815/968-0660
Street Address: 1300 Rock Street | County: Winnebago
City: Rockford | State: IL | Zip: 61101
Region: Rockford | Inspection Date: 2/9/95 | From: 1:30pm To: 4:15pm
Weather: Cloudy 33°F moderate wind

RECEIVED
JUN 07 1995
U. S. EPA, REGION V
SWB — PMS

TYPE OF FACILITY

Notified As: C | Regulated As: C
LDF? no (Yes or No) HPV? no | 90-Day F/U Required?: YES ✓ NO ____

TYPE OF INSPECTION

CEI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____
CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 80/08/18, from (initial) or (subsequent) Notification.
Initial Part A Date: __/__/__ Amended: __/__/__
Part A Withdrawal requested: __/__/__ Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) __/__/__ Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) __/__/__
Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ Consent Decree: __/__/__
Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 19	19	19

RECEIVED
MAY 08 1995
IEPA-DLPC

IL 532-1834

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005145958 IEPA #: 2010300054

Facility Name: Barber Colman Co Rock St. Plt (Colman Metal Finish) Phone #: 815/968-0660

Street Address: 1300 Rock Street County: Winnebago

City: Rockford State: Illinois Zip: 61105-1240

Region: 1 Inspection Date: 3/4/93 From: 1:00pm To: 2:30pm

Weather: cold, overcast

TYPE OF FACILITY

Notified As: G Regulated As: G

LDF? NO (Yes or Not) HPV? 90-Day F/U Required?: YES _____ NO ✓

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/17/80 Amended: 10/15/86

Part A Withdrawal requested: 1/7/87 Approved by (US) (IL) EPA: 5/5/88

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) ___/___/___ Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) ___/___/___

Illinois Attorney General: Y or (N) ___/___/___ County State's Attorney: Y or (N) ___/___/___

ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report '9	'9	'9

RECEIVED
25 MAR 1993
IEPA/DLPC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HR-12

09 AUG 1988

Mr. Kirit Patel
Barber Colman Company
P.O. Box 2940
Lovespark, Illinois 61132

Re: Barber Colman Company
ILD 005 145 958

Dear Mr. Patel:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on June 1, 1988. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our May 25, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 353-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS
L.C. Petersen, Barber Colman Co.

Disk #4

CONCURRENCES								
SYMBOL								
SURNAME	E.V.			P.E.D.				
DATE	8/2/88	8/3/88		8-4-88				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

THOMAS

BARBER COLMAN COMPANY

June 1, 1988

Mr. Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section
USEPA
Region 5
230 South Dearborn Street
Chicago, IL 60604

Attntion: 5HS-12

RE: Notice of Violation
Barber Colman Company
ILD 005 145 958

Dear Sir,

In response to the violations noted in the May 2, 1988 letter, the following actions are being done.

For Item 1. Failure to determine the appropriate treatability group as required by Section 268.41. Enclosed are waste waters analysis including an analysis of the waste in question, 1,1,1-trichloroethane. It was determined that our waste waters are below the prescribed effluent levels provided by the Sanitary District of Rockford and the spent solvent exceeded our capability to render it non-hazardous. Enclosed are our most current waste stream analysis and spent 1,1,1-trichloroethane analysis.

For Item 2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7 (a). The first inspection of the spent solvent recycling facility was in the early 1980's. An additional inspection will be made by July 2, 1988 with certification sent or notification of changing recycling firms with the appropriate certification.

For Item 3. Failure to provide separate written notice attached to manifest for each shipment of F-solvent wastes with U.S.E.P.A. hazardous waste numbers, the applicable treatment standard, manifest number, waste analysis data, where available, as required by Section 268.7 (a)(1). Enclosed is a copy of the form that will accompany the spent solvent for recycling.

Sincerely,

L.C. Petersen, P.E.
Manager, CMF

Barber-Colman Company
ROCKFORD PLANT
1300 Rock Street
P.O. Box 1240
Rockford, IL U.S.A. 61105-1240
Phone: (815) 968-6833
Telex: 4330367
Cable: BARCOL

aqualab inc.

ANALYTICAL REPORT

Mr. Kirit Patel
BARBER COLMAN
1354 Clifford Ave.
Rockford IL 61111

06-12-87

Sample No: 46680

SAMPLE DESCRIPTION: Wastewater

Date Taken: 05-07-87 1515

Date Received: 05-07-87

VOLATILE COMPOUNDS

Acrolein	<10.	ug/L
Acrylonitrile	<10.	ug/L
Benzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<1.0	ug/L
Bromomethane	<10.	ug/L
Carbon tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<10.	ug/L
2-Chloroethyl vinyl ether	<1.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<10.	ug/L
Dibromochloromethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	4.1	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L
cis-1,2-Dichloroethene	<1.0	ug/L
1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Ethylbenzene	2.2	ug/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

ANALYTICAL REPORT

Mr. Kirit Patel
BARBER COLMAN
1354 Clifford Ave.
Rockford IL 61111

06-12-87

Sample No: 46680

SAMPLE DESCRIPTION: Wastewater

Date Taken: 05-07-87 1515

Date Received: 05-07-87

VOLATILE COMPOUNDS

Methyl ethyl ketone	<1.0	ug/L
Methylene chloride	<5.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
Toluene	<1.0	ug/L
1,1,1-Trichloroethane	105.2	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Vinyl chloride	<10.	ug/L
Xylenes	9.7	ug/L

Toni Gartner, Manager
Rockford Division

aqualab inc.

ANALYTICAL REPORT

Mr. Rod Johnson
BARBER COLMAN
555 Colman Drive
Rockford IL 61125

01-14-87

Sample No: 44186

SAMPLE DESCRIPTION: Degreasing Solvent
Used 1,1,1-Trichloroethane

Date Taken: 12-22-86

Date Received: 12-23-86 1155

Acidity (CaC03)	4,100.	ug/g
Cyanide, Total	<0.1	ug/g
Density, Nonaqueous	66.69	lb/ft3
Phenol	1.97	ug/g
Solids, Total(non-aqueous)	25.56	%
Sulfide	5.04	ug/g
Water (Paint Filter)	Contains Free Liquid	
Corrosivity (pH)	6.12	units
Ignitability (Flash Point)	Flash @ 115	Degree F
Reactive Sulfide	0.55	ug/g
Reactive Cyanide	<0.025	ug/g
EP Tox - Arsenic	<0.01	mg/L
EP Tox - Barium	0.13	mg/L
EP Tox - Cadmium	0.009	mg/L
EP Tox - Chromium	0.022	mg/L
EP Tox - Lead	0.14	mg/L
EP Tox - Mercury	<0.001	mg/L
EP Tox - Selenium	<0.01	mg/L
EP Tox - Silver	<0.001	mg/L

T. Gartner

Toni Gartner, Manager
Rockford Division

Austin Division	Bartlett Division	Rosner/Runyon Division	Rockford Division	Corporate Office
2621-130 Ridgepoint Dr. Austin TX 78754 512-928-8905	850 West Bartlett Rd. Bartlett, IL 60103 312-289-3100	222 South Morgan St. Chicago, IL 60607 312-666-4469	3548 35th St. Rockford, IL 61109 815-874-2171	850 West Bartlett Rd. Bartlett, IL 60103 312-289-3100

NOTIFICATION OF TREATMENT REQUIREMENTS FOR LAND DISPOSAL RESTRICTED WASTE STREA

Company _____ Address _____

U.S. EPA ID # _____ Manifest # _____

This serves as notification that the above-referenced waste stream is affected by the U S. EPA Land Disposal Restrictions set forth in 40 CFR 268. The following indicated substances and treatment standards are those applicable to this waste stream.

TREATMENT STANDARDS FOR SPENT SOLVENT WASTES

F001 - F005 Spent Solvents	Waste Waters Containing Spent Solvents Concentration mg/L	All Other Spent Solvent Waters Concentration mg/L
___ Acetone	0.05	0.59
___ n-Butyl alcohol	5.0	5.0
___ Carbon disulfide	1.05	4.81
___ Carbon tetrachloride	.05	.96
___ Chlorobenzene	.15	.05
___ Cresols (and Cresylic acid)	2.82	.75
___ Cyclohexanone	.125	.75
___ 1,2-Dichlorobenzene	.65	.125
___ Ethylacetate	.05	.75
___ Ethyl benzene	.05	.053
___ Ethyl ether	.05	.75
___ Isobutanol	5.0	5.0
___ Methanol	.25	.75
___ Methylene chloride	.20	.96
___ Methylene chloride (from the pharmaceutical industry)	12.7	.96
___ Methyl ethyl ketone	0.05	0.75
___ Methyl isobutyl ketone	0.05	0.33
___ Nitrobenzene	0.66	0.125
___ Pyridine	1.12	0.33
___ Tetrachloroethylene	0.079	0.05
___ Toluene	1.12	0.33
___ 1,1,1-Trichloroethane	1.05	.41
___ 1,2,3-Trichloro -1,2,2-trifluoroethane	1.05	0.96
___ Trichloroethylene	0.062	0.091
___ Trichlorofluoroaethane	0.05	0.96
___ Xylene	0.05	0.15

TREATMENT STANDARDS FOR CALIFORNIA LIST CONSTITUENTS

Constituent	Concentration* (mg/L)
___ Cyanides	1000
___ Arsenic	500
___ Cadmium	100
___ Chromium VI	500
___ Lead	500
___ Mercury	20
___ Nickel	134
___ Selenium	100
___ Thallium	130
___ Liquids with pH < 2.0	---
___ Liquids with PCB's	50 ppa
___ Wastes containing HOC's*	
- Liquid containing HOC's	1000 mg/L
- Solid containing HOC's	1000 mg/kg

* Halogenated organic compounds

** Cyanide and metal concentrations bject to change with issuance of final ulation. See 52 FR 29992, August 12, 1987

The above information is based upon ( ) an attached waste analysis or ( ) generator knowledge of the waste stream(s).

GENERATOR INFORMATION

Signed _____ Printed Name _____

Title _____ Date _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

25 MAY 1988

Mr. Kirit Patel
Barber Colman Company
P.O. Box 2940
Lovespark, Illinois 61132

Re: January 29, 1988, NOV
Barber Colman Company
ILD 005 145 958

Pursuant to a telephone conversation with you on May 9, 1988, I am sending you a copy of a waste notification statement. The notification statement enclosed is not an official United States Environmental Protection Agency (U.S. EPA) statement, but a statement that many other facilities are using and is found to be acceptable by U.S. EPA.

If you have any further questions, please contact me at (312) 886-4581.

Sincerely yours,

Zetta L. Thomas
IL/MI/WI Enforcement Program Section

Enclosure

5HS-12:ZTHOMAS:5/25/88:ev DISK #4

CONCURRENCES

SYMBOL								
SURNAME	E.V.							
DATE	5/25/88	5/26/88						

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

Inspector: Jack E. Holzer
Address: 4302 North Main Street
Rockford, Illinois 61101
Telephone No: 815/968-0660

FOS

DRAFT
RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Barber Colman Company — 1300 Rock Street
A. Handler Name — B. Street (or other identifier)

Rockford — Illinois — 61101 — Winn Bago
C. City — D. State — E. Zip Code — F. County Name

Metal Finisher and Manufacturer of Environmental Controls, Aircraft Products and Related Electronic Components.
G. Nature of Business; Identification of Operations

ILD 005145958 - 2010300054
H. EPA ID #

Lauren C "Pete" Peterson — 815/968-0660
I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

RECEIVED
MAR 03 1988
IEPA/DLPC

F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 — ✓ Yes ___ No
b. F002 — ___ Yes ✓ No
c. F003 — ___ Yes ✓ No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___ Yes ✓ No

d. F004 — ___ Yes ✓ No
e. F005 — ___ Yes ✓ No

2. Source of the above: Form 8700-12 ✓; Part A ___; Part B ___; other (specify) ___

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: _____

Handler Name: BARBER-COLMAN CO.
ID Number: 2010300054-ILD005165958
Inspector: JACK E. HOLZER
Date: 1-29-88

B. BDAT Treatability Group - Treatment Standards Identification — Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

___Yes X No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ___Yes X No FACILITY UNAWARE OF RESTRICTION REQUIREMENTS NO TESTING, NOTIFICATION, OR CERTIFICATION.

b. TCLP ___Yes X No

c. Other (specify)_____

If knowledge, note how this is adequate:

_____

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: N/A NO TEST

Note any problems:_____

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MAR 03 1988
IEPA/DLPC

d. Were wastes tested using TCLP when a process or wastestream changed?

___Yes X No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? X Yes ___No ___Some MOST LIKELY - FACILITY HAS NOT MADE DETERMINATION.

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3] ___Yes X No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite?

X Yes ___No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: BARBER COLMAN Co.
ID Number: 2010300054 - ILD000514958
Inspector: JACK E. HOLZER
Date: 1-29-88

b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted? Comments
X Yes ___ No DISPOSAL OFFSITE.

If yes, TSDF Checklist must be completed.

c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
___ Yes X No NO TEST RESULTS AVAILABLE

2. Offsite Management

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ✓ Yes ___ No NO NOTIFICATION MADE OTHER THAN MANIFEST

(ii) Applicable treatment standard? ___ Yes ✓ No

(iii) Manifest number? ✓ Yes ___ No

(iv) Waste analysis data, if available? ___ Yes ✓ No

Identify offsite treatment facilities ORGANIC INDUSTRIES, INC. 114 N. MAIN ST. COTTAGE GROVE, WISCONSIN

b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

(i) EPA Hazardous waste number? ___ Yes ___ No

(ii) Applicable treatment standard? ___ Yes ___ No

(iii) Manifest number? ___ Yes ___ No

(iv) Waste analysis data, if available? ___ Yes ___ No

(v) Certification that waste meets treatment standards? ___ Yes ___ No

MEETING TREATMENT STANDARDS WAS NOT BEEN MADE BY COMPANY THROUGH LACK OF KNOWLEDGE.

Identify land disposal facilities receiving the BDAT certified wastes ___

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MAR 03 1988
IEPA/DLPC

Handler Name: BARBER COLMAN CO.
ID Number: 2010300054 ILD 005145958
Inspector: JACK E. HOLZER
Date: 1-29-88

c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

___Yes ___No N/A

Comments

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

___Yes X No

If yes, was facility operating as a TSD under interim status or final permit? ___Yes ___No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes X No

If yes, list type of treatment unit and processes

_____

_____

_____

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

BARBER COLMAN COMPANY
1300 ROCK STREET
ROCKFORD, ILLINOIS 61101
ILD005145958 - 2010300054

California List Waste

1 Does the handler generate the following wastes?

F-NUMBERS GENERATED ON SITE: F001; F006, F007

a. Liquid hazardous wastes having a PH less than or equal to two [2.0]?
✓ Y ____ N

b. Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to
50 ppm? ____ Y ✓ N
500 ppm? ____ Y ✓ N

c. Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1000 mg/l and less than 10,000 mg/l HOCs?
____ Y ✓ N

2) a. Is the Paint Filter Liquids Test (PFLT method 9095) performed as described by SW-846 to determine whether waste is in liquid form?
____ Y ✓ N

GENERATE ONLY ONE F001 WASTE TRICHLOROETHANE WHICH IS RECYCLED OFF OF SITE.

b. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a) 265.13(a)]?
✓ Y ____ N

3) If waste was determined to be in liquid state according to PFLT, was waste solidified using an absorbent?
____ Y ✓ N

) what type absorbent was used? NONE

) What type of waste was absorbent added to (refer to question 1)? (Check where applicable) N/A

a. Liquid hazardous waste having a PH less than or equal to 2 ____
b. Liquid hazardous waste containing PCB in concentrations greater than 50 ppm ____: greater than 500 ppm ____ N/A
c. Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l ____

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Did handler determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether waste has a PH less than or equal to two [2.0] based on:

a. Knowledge of wastes ____ Y ✓ N
b. Testing ✓ Y ____ N
List method _____

If knowledge, note how this is adequate: _____

b. List test method used. ____ ✓

c. List constituent and concentration level which exceeded prohibition levels. ORGANIC INDUSTRIES, INC. COTTAGE GROVE, WISCONSIN N/A

8) Did generator treat waste on-site or send off-site (Identify off-site facility)? ____ ✓

9) If waste was determined to be restricted from land disposal (i.e., liquid, exceeding concentration levels and/or PH less than 2.0) did handler provide treatment facility:

(i)	EPA waste number?	✓ Y		N
(ii)	Specified treatment standard?	Y	✓	N
(iii)	Manifest number?	✓ Y		N
(iv)	Waste analysis data, if available?	Y	✓	N

10) Did generator/treater dispose of waste on-site or send off-site? ____

Identify off-site disposal facility N/A

11) If waste was determined not restricted from land disposal, did handler provide disposal facility with:

(i)	EPA hazardous waste number?	Y		N
(ii)	Manifest number?	Y		N
(iii)	Waste Analysis Data, if available?	Y		N
(iv)	Specified treatment standard?	Y		N
(v)	Certification that waste passed PFLT (non-liquid), or does not exceed specified prohibition levels?	Y		N

N/A

12) Are restricted wastes containing PCBs (i.e., concentration greater than or equal to 50 ppm) stored greater than 1 yr?

Y ✓ N

13) Does facility handle any of the following waste:

a.

(i) Waste containing HOC greater than or equal to 1000 mg/kg (non-liquid hazardous waste)

Y ✓ N

(ii) Waste containing HOC greater than or equal to 10,000 mg/l (liquid hazardous waste)

Y ✓ N

(iii) Waste containing HOC greater than 1000 mg/l and less than 10,000 mg/l and are not dilute HOC waste water?

Y ✓ N

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IEPA/DLPC

* Cyanide and metals concentration levels not yet codified in Regulation. Statutory levels under 3004(d)(2) should be used.

If yes, answer 13(b) and (c), if no, answer 14.

13) b. Is any waste listed in 13(a) disposed of in a land fill or surface impoundment? ____ Y ✓ N

If yes, continue, if no answer 14.

c. Is facility in compliance with section 268.5(h)(2) [New, replacement, or laterally expanded units must meet minimum technology requirements] and section 264 & section 265 Subpart F ground-water monitoring requirements?

____ Y ____ N

14) If facility handles any liquid hazardous waste containing PCB complete the following section:

a. List concentration levels of PCB in waste stream(s) (ppm)

b. Describe method of treatment/disposal of wastes(s) listed in section (a) and identify facility receiving this waste

NO MATERIALS HANDLED CONTAINING PCB AT THIS FACILITY.

c. Does facility perform any type of mixing of PCB containing liquid hazardous waste with same or other types of wastes or liquids? ____ Y ✓ N

d. If yes, state reason for mixing:

RECEIVED
MAR 03 1988
IEPA/DLPC

02 MAY 1988

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Lauren C. Peterson
Barber Colman Company
1300 Rock Street
Rockford, Illinois 61101

Re: Notice of Violation
Barber Colman Company
ILD 005 145 958

Dear Ms. Peterson:

On January 29, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271 and for "California List" hazardous wastes on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;

2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a); and

3. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

5HS-12:ZTHOMAS:4/26/88:ev DISK #3

CONCURRENCES								
SYMBOL								
SURNAME	E.V.			P.E.D.				
DATE	4-28-88	4/29/88		4-29-88				

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. *↑(Extra charge)↑*
2. ☐ Restricted Delivery *↑(Extra charge)↑*

3. Article Addressed to:
Ms. Lauren C. Peterson
Barber Colman Company
1300 Rock Street
Rockford, IL 61101

4. Article Number
P 487 467 734

Type of Service:
- ☐ Registered
- ☒ Certified
- ☐ Express Mail
- ☐ Insured
- ☐ COD

Always obtain signature of addressee or agent and DATE DELIVERED

5. Signature — Addressee
X

6. Signature — Agent
X Mike Hanson

7. Date of Delivery 5-5-8

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

681

17 November 1980

U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Gentlemen:

Enclosed are forms required to be submitted by companies treating hazardous wastes or storing hazardous wastes on their premises for more than 90 days, by November 19, 1980.

The plants covered under this mailing are:

1. 1300 Rock Street, Rockford, Illinois
2. 1354 Clifford Avenue, Rockford, Illinois
3. 1351 Windsor Road, Rockford, Illinois

Treating of waste occurs only at our Rock Street location.

Normally, we do not store waste at our facilities over 90 days. However, due to the currently unpredictable waste disposal situation, we wish to be permitted for storage of wastes at our facilities over 90 days. In case of a disposal facility being unable to dispose of our waste we may have to store our wastes until an environmentally safe method of disposal is found.

NPDES forms (Form 2C) are not submitted in this mailing as we have those under the authority of the State of Illinois for each plant.

If you have any questions please contact us immediately.

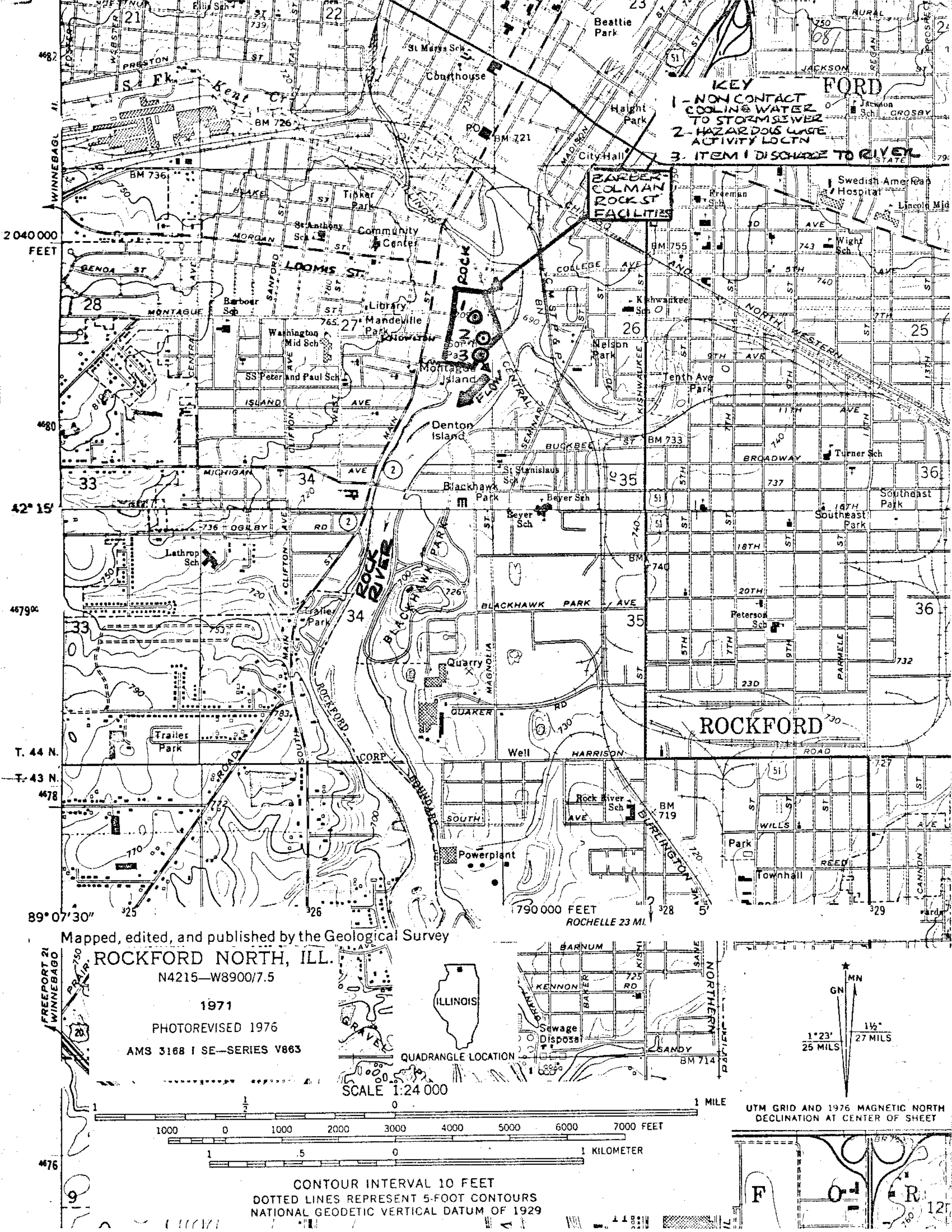
Sincerely,

Arne Venteris, P.E.
Corporate Facilities Engineer

AV:
jmj

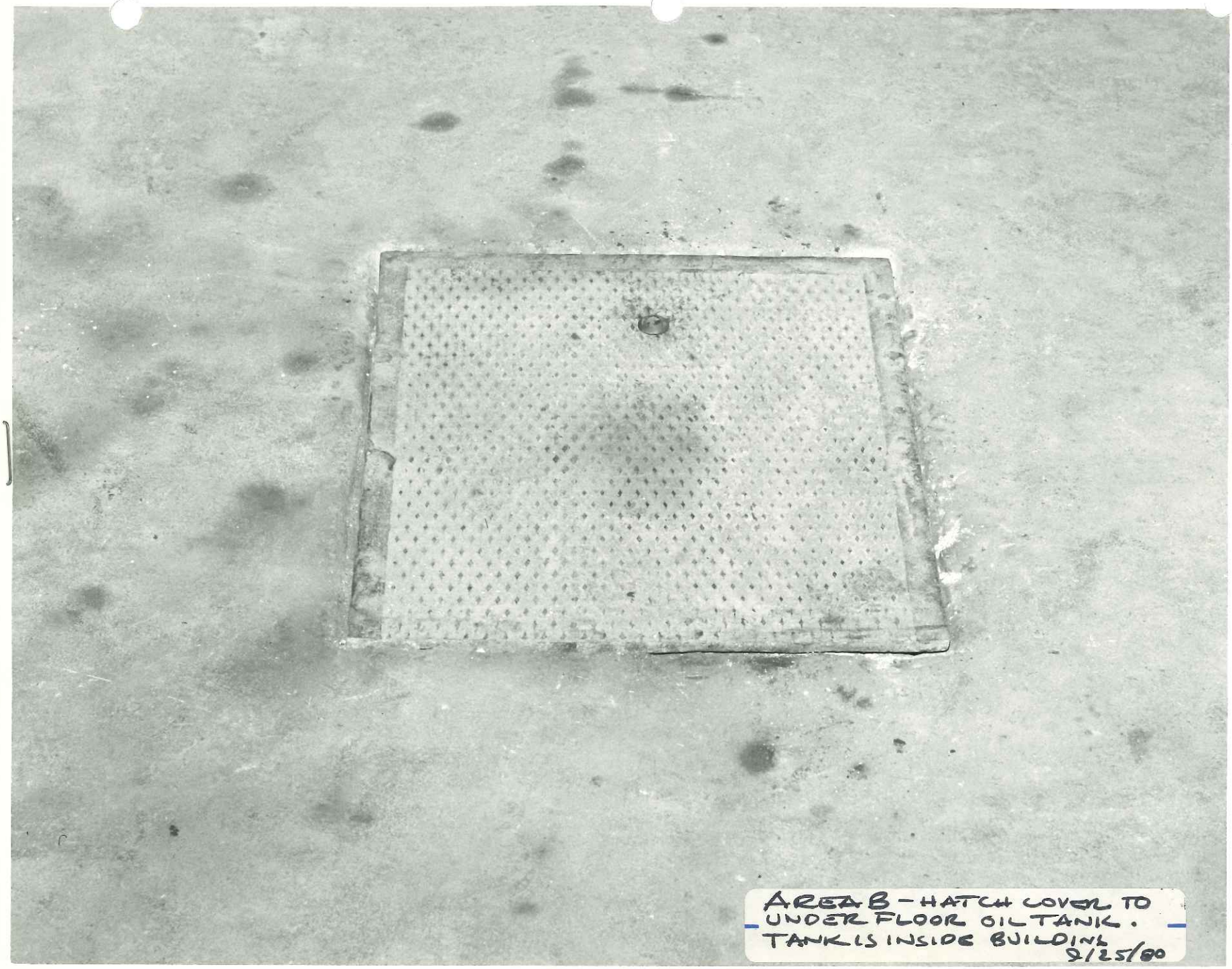
Enclosures

Barber-Colman Company
1300 Rock Street, Rockford, Illinois U.S.A. 61101 Phone: 815/968-6833 Teletype: 815/962-2420 Telex: 25-7413 Cable: BARCOL


KEY
1 - NON CONTACT COOLING WATER TO STORM SEWER
2 - HAZARDOUS WASTE ACTIVITY LOCTN
3. ITEM 1 DISCHARGE TO RIVER
BARBER-COLMAN ROCK ST FACILITIES
FLOW
ROCK RIVER
LOOMIS ST.
ROCKFORD
FORD
Mapped, edited, and published by the Geological Survey
ROCKFORD NORTH, ILL.
N4215—W8900/7.5
1971
PHOTOREVISED 1976
AMS 3168 I SE—SERIES V863
ILLINOIS
QUADRANGLE LOCATION
SCALE 1:24 000
1 MILE
7000 FEET
1 KILOMETER
CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929
UTM GRID AND 1976 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
GN
MN
1°23′ 25 MILS
1½° 27 MILS
89°07′30″
42°15′
T. 44 N.
T. 43 N.
790 000 FEET
2 040 000 FEET
ROCHELLE 23 MI.


AREA D - NO WASTE
STORED HERE WHEN
PICTURE WAS TAKEN 9/25/80

AREA C. - NOTE: BARRELS SHOWN ARE EMPTY NO WASTE WAS STORED WHEN PICTURE WAS TAKEN 9/25/80



AREA B - HATCH COVER TO UNDERFLOOR OIL TANK. TANK IS INSIDE BUILDING 9/25/80

AREA A – NOTE DIKS TO CONTAIN ACCIDENTAL LEAKS 9/25/80

D. Corrective Action

BARBER-COLMAN COMPANY Park Plant

1354 Clifford Avenue
P.O. Box 2940
Loves Park, IL U.S.A. 61132-2940
Phone: (815) 877-0241
Telex: 4930365

Dec. 19, 1991

Mr. Kevin M. Pierard
USEPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Attention: HRE-8J

Dear Sir,

The copy of the PA/VSI for Barber Colman (ILD 005 145 958) was received 12/12/91.

There are a number errors in the report and the following commentary are corrections as identified by sections.

2.2 FACILITY OPERATIONS

Currently Barber-Colman, Colman Metal finishing works 3 shifts per day with 35, 8 & 7 people working the 1st, 2nd and 3rd shifts, respectively.

The separate plating operations include zinc, nickel, copper, chrome, anodizing and black oxide.

TABLE 1 SWMU

Items 8 & 9 have been under Reed-Chatwood responsibility since 1984.

2.3 WASTE GENERATING PROCESSES

The statement "Facility representatives verbally stated that the nickel and zinc filters were non-hazardous" is incorrect and is misleading. During 1985 and 1986 B-C, Colman Metal Finishing used filters on the plating baths that generated filter papers and spools that were a hazardous waste. It was also during this time that new filter systems were being purchased and installed that eliminated the generation of these filter papers and spools.

BARBER-COLMAN COMPANY Park Plant

1354 Clifford Avenue
P.O. Box 2940
Loves Park, IL U.S.A. 61132-2940
Phone: (815) 877-0241
Telex: 4330365

The statement "In addition, the nickel and zinc filter systems have been replaced by the filter press in the Waste Water Treatment Unit (SWMU 5)" is not true. The plating baths need the filtration units to operate properly and the Waste Treatment system needs the filter press to operate properly. These are two independent operations of each other and one cannot replace the other.

The information regarding the batteries was not supplied by any representative of B-C, Colman Metal Finishing.

2.5 REGULATORY HISTORY

Documentation and letters are available showing the B-C, Colman Metal Finishing compliance to the violation of 35 Illinois Administrative Code. These were not asked for or reviewed by the personnel conducting the audit.

B-C, Colman Metal Finishing is no longer the principle owner of the facility as of 1984 and relinguished this responsibility to the new owner, Reed Chatwood. Both operations, Reed-Chatwood and B-C, Colman Metal Finishing discharge non-contact cooling water to the Rock River.

Sincerely yours,

L.C. Petersen
Manager, CMF

HRE-8J

DEC 1 1 1991

L.C. Petersen, Manager
Barber-Colman Company
1354 Clifford Avenue
P.O. Box 2940
Loves Park, Illinois 61132-2940

Re: Barber Colman Company
ILD 005 145 958

Dear Mr. Petersen:

Per your request of May 2, 1991, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations sections have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,
ORIGINAL SIGNED BY
KEVIN M. PIERARD

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

HRE-8J:FHARRIS:12/10/91:6-2884 DISK #2UNION.RES

| OFFICIAL FILE COPY |

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	12/11/91	12/11/91	

BARBER COLMAN COMPANY
a Siebe company

May 2, 1991

USEPA
Region 5
230 S. Dearborn St.
Chicago, IL 60604

Attention: 5HR-12

Dear Ms. Sheri Bianchin,

On April 23, 1991, a visual inspection was conducted by Resource Applications, Inc. (Mr. Jeff Indeck and Ms. Cynthia Tarka) at Barber Colman, CMF in Rockford, IL (ILD#005145958).

We would like a copy of the Preliminary Assessment/ Visual Site Inspection Report for our records. Please advise us when you feel this report may be sent.

Sincerely yours,

L.C. Petersen

L.C. Petersen
Mgr., CMF

Barber-Colman Company
PARK PLANT
1354 Clifford Avenue
P.O. Box 2940
Loves Park, IL U.S.A. 61132-2940
Phone: (815) 877-0241
Telex: 4330365

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

BARBER-COLMAN COMPANY ROCKFORD, ILLINOIS

ILD 005 145 958

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 145 958
Date Prepared	:	November 19, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL02
Prepared by	:	Resource Applications, Inc.
Principal Investigator	:	Jeff Indeck
Telephone No.	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Barber-Colman Company, Colman Metal Finishing (Barber-Colman) facility in Rockford, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Barber-Colman facility performs a variety of metal finishing procedures, including plating, heat treating, and deburring and blasting (rotofinishing). Barber-Colman has been operating at its current facilities since 1905. In 1984, Reed Chatwood, Inc. purchased the facility and some of Barber-Colman's equipment. Barber-Colman, located at 1300 Rock Street, now leases and occupies parts of four buildings of a 20-acre industrial complex owned by Reed Chatwood, Inc. Barber-Colman currently operates as a generator under RCRA, although in the past, the facility was regulated as a Treatment, Storage, and Disposal facility. Prior to its change to generator status, the facility closed 4 hazardous waste storage areas. Hazardous wastes are currently generated by plating operations and are stored in 55-gallon drums and a 20-cubic yard dumpster.

The PA/VSI identified the following 10 SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Butler Building Storage Area
2. Cold Storage Area
3. Carpenter's Shed Storage Area
4. Outside Earthen Storage Area
5. Wastewater Treatment Unit
6. Plating Cake Dumpster
7. Waste Storage Area
8. Battery Storage Area
9. Paint Waste Storage Area
10. Satellite Accumulation Areas

The potential for a release to the ground water, surface water, air or soil from this facility is low. Most of the SWMUs that currently handle hazardous wastes are inside buildings, have secondary containment, and/or are used to handle wastes in relatively small quantities. The exceptions are the Battery Storage Area (SWMU 8) and the Paint Waste Storage Area (SWMU 9). Although wastes have not been stored at the Battery Storage Area (SWMU 9) since 1987, the past potential for a release to soil was high. Batteries were stored directly on top of the soil, so any release would have entered the soil. Because the terrain in the area slopes toward the Rock River, located immediately east of the facility, there was a moderate potential that a release could have entered the river via runoff. Rockford receives its ground water from a shallow sandstone aquifer, therefore if the soil was contaminated in the past, the past potential for release and current potential for ongoing release to the ground water was and is moderate. If the soil was not contaminated, then the past potential and current potential for release was and is low. The facility has not used the Paint Waste Storage Area (SWMU 9) since 1984. During the time the unit was operating, the integrity of the asphalt and the integrity and capacity of containers that stored the wastes were unknown. Past potential release to soil, ground water, surface water, and air was probably low. If the soil is contaminated, then current potential for an ongoing release to ground water is moderate. If the soil is not contaminated, then the current release potential to ground water is low.

Surface waters in the vicinity of the plant are a potential receptor of hazardous materials. Filter cake from the treatment of plating wastes is stored in a dumpster immediately adjacent to the Rock River. A plastic tarp covers the dumpster, so release potential is low.

Barber-Colman is located in a light industrial area on the west bank of the Rock River. Public access to the facility is controlled by locked entrance doors.

The city of Rockford receives its water supply from a shallow sandstone aquifer located at a depth of 100 feet and extending to 300 feet. The nearest municipal well is located 0.8 mile southwest of the facility (downgradient). The nearest residences are approximately a quarter-mile to the west of the facility. Apart from the Rock River, which is immediately to the east of the facility, there are no sensitive environments located within two miles of the facility.

Two separate releases have occurred at the facility, both involving commercial product acids. In 1984, 350 gallons of sulfuric acid leaked out of a pipe connected to a product tank. During remediation, 100 55-gallon drums of soil were removed from the site. Subsequent soil sampling showed no contamination. In 1989, 260 gallons of hydrochloric acid were released from a product tank and

breached the secondary containment berm. Powdered lime was applied to the soil to neutralize the release. Soil samples taken 6 and 8 months after the release showed that no contamination exists.

Soil sampling should be conducted at the Battery Storage Area (SWMU 8) and the Paint Waste Storage Area (SWMU 9) to determine the presence of contaminants.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for Barber-Colman Company, Colman Metal Finishing (Barber-Colman).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Barber-Colman facility in Rockford, Illinois. The PA was completed on April 22, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed documents from the U.S. Department of Agriculture (USDA), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), and the Illinois State Geological Survey (ISGS). The VSI was conducted on April 23, 1991. It included interviews with Barber-Colman facility representatives and a walk-through inspection of the facility. Ten SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 14 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

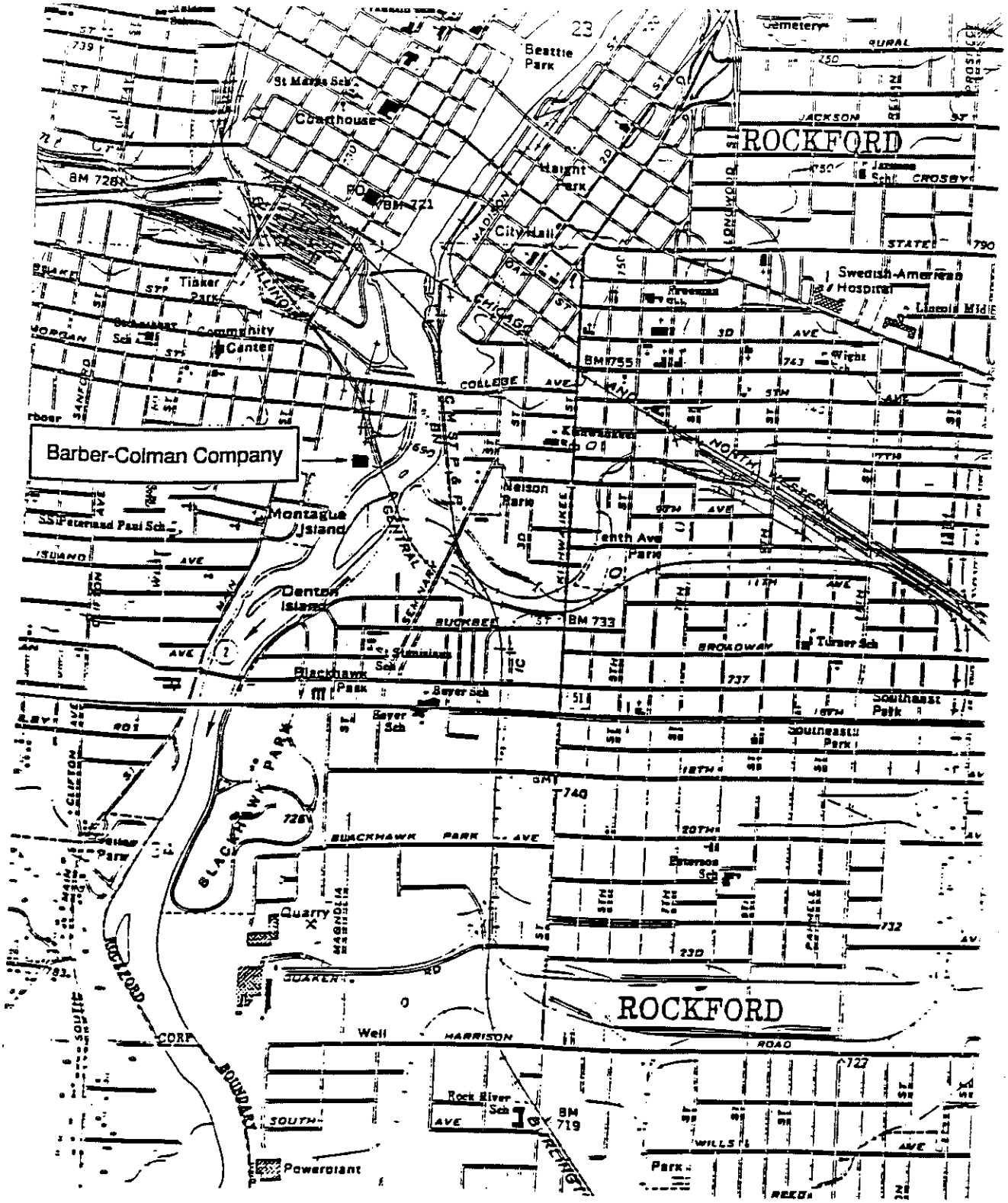
2.1 FACILITY LOCATION

Barber-Colman is located at 1300 Rock Street, Rockford, Illinois (Figure 1). The facility is situated in a light industrial area at latitude 42° 15' 32" N, longitude 89° 05' 53" W (Barber-Colman, 1980b.) The property covers 20 acres, of which 40,000 square feet is utilized by Barber-Colman. Industrial facilities border the facility to the north, south and west; the Rock River is immediately to the east.

2.2 FACILITY OPERATIONS

Barber-Colman began operations is 1905. The facility steadily grew, making additions during the 1930's and 1940's. In 1984, Reed Chatwood, Inc. (Reed Chatwood), a textile machinery manufacturing company, purchased the property, along with Barber-Colman's textile division equipment. Barber-Colman began leasing the 40,000 square feet that it now occupies from Reed-Chatwood. Currently, Barber-Colman employs 45 individuals, working in one shift.

Barber-Colman manufactures electroplated fasteners for the automotive, agricultural, and construction industries. The facility conducts 3 separate processes, depending on the specifications of the customer. Processes include rotofinishing, heat treating, and plating. These processes can be conducted separately or in conjunction with each other, depending on customer specifications. Rotofinishing involves the tumbling of products with stones and water to remove rough edges and large scale build up. Water effluent containing metals is discharged to the sanitary sewer system, and is monitored by both the facility and the Rockford Sanitary District; this is the only waste from the rotofinishing process. Heat treating is conducted to achieve particular mechanical strengths within the products. The atmospheric furnace process involves burning of gases to heat the metals. No waste is produced by this process. Cyanide salts are used for another heat treating process. Waste cyanide salts (F007) are drummed and disposed of by Cyanokem of Detroit, Michigan. Barber-Colman conducts 6 separate plating operations that include; zinc, nickel, chrome, copper, aluminum, and black zinc oxide. Prior to plating, the products are placed in a series of caustic and acid cleaning tanks (pickling) to



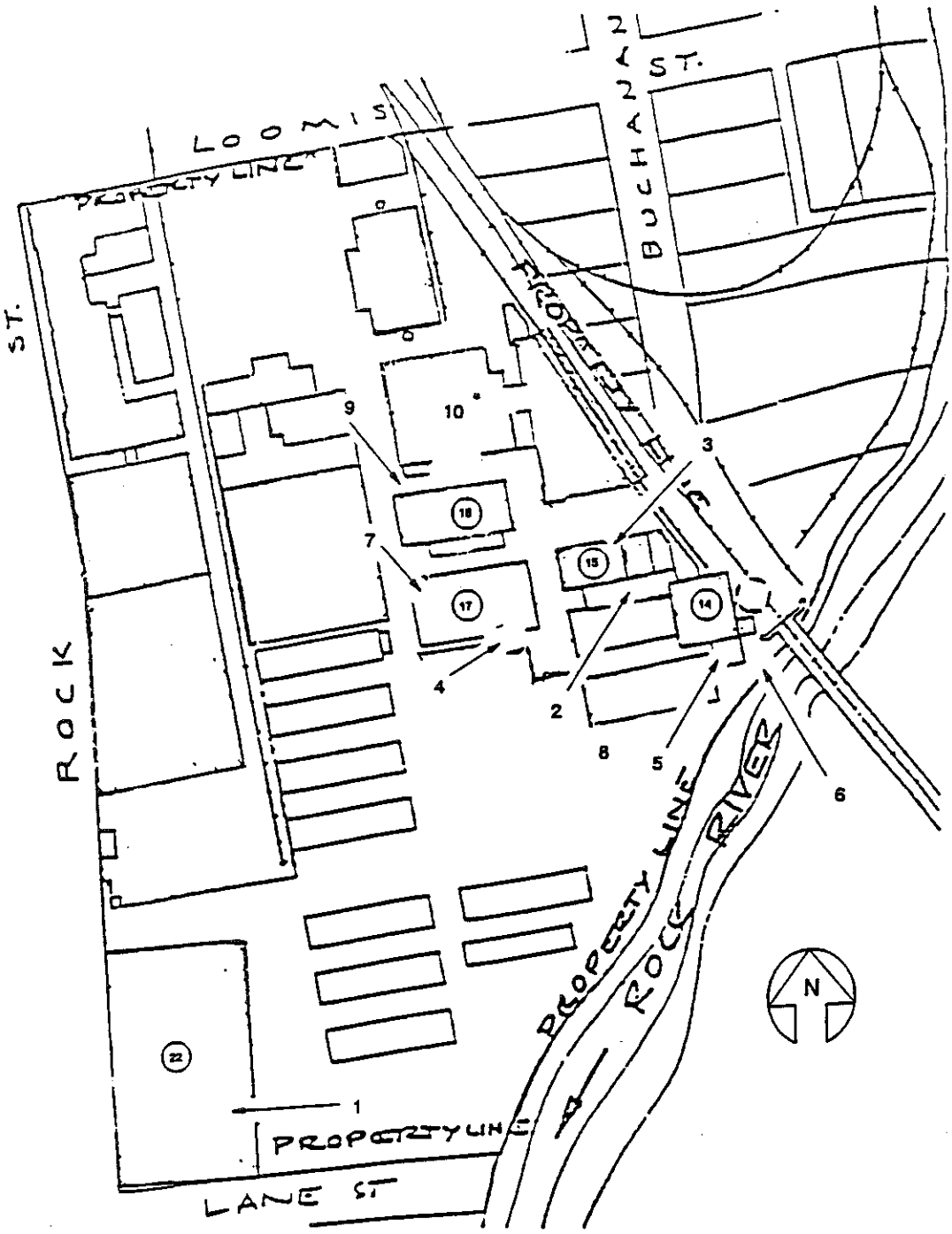
Barber-Colman Company Rockford, Illinois
Figure 1 FACILITY LOCATION
Scale: 1" = 2000' Source: USGS Topographical Map, 1977
Resource Applications, Inc.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Butler Building Storage Area	Yes	Closed in 1988.
2	Cold Storage Area	Yes	Closed in 1988.
3	Carpenter's Shed Storage Area	Yes	Closed in 1988.
4	Outside Earthen Storage Area	Yes	Closed in 1988.
5	Wastewater Treatment Unit	No	Active.
6	Plating Cake Dumpster	No	Active, less than 90-day storage.
7	Waste Storage Area	No	Active, less than 90-day storage.
8	Battery Storage Area	No	Inactive since 1987.
9	Paint Waste Storage Area	No	Inactive since 1984.
10	Satellite Accumulation Areas	No	Active, less than 90-day storage.

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B Permit.



Solid Waste Management Units

1. Butler Building Storage Area
2. Cold Storage Area
3. Carpenter's Shed Storage Area
4. Outside Earthen Storage Area
5. Wastewater Treatment Unit
6. Plating Cake Dumpster
7. Waste Storage Area
8. Battery Storage Area
9. Paint Waste Storage Area
10. Satellite Accumulation Areas

* SWMU 10 is satellite areas located in Buildings 14 and 16.

Barber-Colman Company Rockford, Illinois
Figure 2 FACILITY LAYOUT/SWMU LOCATIONS
Scale: 1" = 200' Source: Barber-Colman Company, 1980b
Resource Applications, Inc.

remove scale build up. After pickling, the products can then be plated. SWMUs at the Barber-Colman facility are listed in Table 1 and Figure 2 shows their location in the facility.

Since 1984, wastes generated from the plating processes have been treated in the Wastewater Treatment Unit (SWMU 5). After treatment, wastewater is discharged into the sanitary sewer system, while the sludge is pumped to a filter press (part of SWMU 5). Filter cake from the press is stored in the Plating Cake Dumpster (SWMU 6). Prior to 1984, plating wastes were treated in a Batch Treatment Unit, located in the same area. Wastewater from the Batch Treatment Unit was discharged into the sanitary sewer system, while the sludge was stored in 55-gallon drums located in the Butler Building Storage Area (SWMU 1), the Cold Storage Area (SWMU 2), the Carpenter's Shed Storage Area (SWMU 3), and the Outside Earthen Storage Area (SWMU 4). Since 1987, spent 1,1,1-trichloroethane (TCA), spent cyanide salts, and spent quenching oil have been stored in Satellite Accumulation Areas (SWMU 10) before transfer to the Waste Storage Area (SWMU 7). Before 1987, the spent TCA, spent cyanide salts, and spent quenching oil were stored in SWMUs 1, 2, and 3.

Past processes at Barber-Colman included automotive repair work and general maintenance painting operations. Used batteries were managed in the Battery Storage Area (SWMU 8) and painting wastes were stored in the Paint Waste Storage Area (SWMU 9). The dates over which these processes occurred are not known. The facility representatives were unable to provide any information on manufacturing operations and waste streams generated prior to 1980.

2.3 WASTE GENERATING PROCESSES

Wastes are primarily generated during the heat treating and plating operations (Table 2). Before heat treating begins, the fasteners are cleaned in a vapor degreaser with TCA (F001). The spent TCA, generated at an annual rate of 14 55-gallon drums, is stored in the Waste Storage Area (SWMU 7) prior to disposal by Avganic Industries, Cottage Grove, WI.

Wastes from the 6 different plating lines are pumped into the Wastewater Treatment Unit (SWMU 5) before discharge into the sanitary sewer system. The Wastewater Treatment Unit consists of two separate processes, a Batch Treatment System (BTS) and a Continuous Treatment System (CTS). In the BTS, the treatment takes place in a single tank. After treatment, the wastewater is discharged to the sewer system and the sludge is pumped to a filter press (part of SWMU 5). In the CTS, the process is the same except the treatment takes place in a series of tanks. Filter cake generated from the filter press is stored in the 20-cubic yard Plating Cake Dumpster (SWMU 6) and picked up by Envirite,

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Spent TCA/F001	Heat Treating Process	SWMUs 1, 7, & 10
Plating Cake/F006	Plating Process	SWMUs 3, 4, & 6
Plating Wastewater	Plating Process	SWMU 5
Spent Quench Oil	Heat Treating Process	SWMUs 1, 2, 3, 7, & 10
Painting Wastes	Painting Process	SWMU 9
Automobile Batteries	Automotive Repair Shop	SWMU 8
Cyanide Salts/F007	Heat Treating Process	SWMUs 7 & 10
Nickel and zinc filters/ non-hazardous	Plating lines (no longer generated)	SWMUs 1, 2 & 3
Chromic acid/D007	Plating lines	Formerly SWMUs 1, 2 & 3; now SWMU 5

Inc., Harvey, Illinois at a rate of 1 dumpster per month. Prior to 1987, waste chromic acid (D007), nickel filters and zinc filters were stored in the Butler Building Storage Area (SWMU 1), the Cold Shed Storage Area (SWMU 2), and the Carpenter's Shed Storage Area (SWMU 3). Facility representatives verbally stated that the nickel and zinc filters were non-hazardous. Chromic acid is no longer drummed for off-site disposal, as the Waste Water Treatment Unit (SWMU 5) has a chrome reduction process, enabling Barber-Colman to treat the waste on-site. In addition, the nickel and zinc filter systems have been replaced by the filter press in the Wastewater Treatment Unit (SWMU 5).

In order to maintain the properties created during the Heat Treating Process, the products must be rapidly cooled. Once the products are removed from the oven, they are placed in a container of quenching oil. Spent quench oil is pumped from the quench tank into 55-gallon drums located in Satellite Accumulation Areas (SWMU 10). The drums are then transferred to the Waste Storage Area (SWMU 7). The waste oil is then shipped to SET Environmental Treatment, Inc., Houston, Texas at a rate of 5 drums every 3 months. There has been no documented event in which quenching oil has come in contact with hazardous wastes. Cyanide salts are also used in the heat treating process. Waste cyanide salts are removed with a ladle and transported to a 55-gallon drum (one of the Satellite Accumulation Areas - SWMU 10) before transfer to SWMU 7. The waste cyanide salts are picked up by Cyanokem, Detroit, Michigan at a rate of 3 drums per year.

From approximately 1970 to 1987, Barber-Colman repaired facility automobiles. Used batteries were stored outside in the Battery Storage Area (SWMU 8). According to facility representatives, the batteries were generated at a rate of approximately 50 per year and were sent to various scrap companies located in Rockford including Erickson Salvage and Rush Batteries, Inc.

From an unknown period of time to 1984, Barber-Colman conducted general maintenance painting operations. The empty containers were managed in the Paint Waste Storage Area (SWMU 9). Facility representatives could not explain how the containers were removed from the property.

2.4 RELEASE HISTORY

On October 9, 1984, a release of 375 gallons of commercial product sulfuric acid occurred. Vandals had ruptured a pipe from a storage tank releasing the commercial sulfuric acid. Powdered lime and calcium carbonate were rototilled into the contaminated soil. One hundred 55-gallon drums of soil were removed, 70 drums were landfilled and 30 drums, with a pH below 2, were shipped for treatment and disposal.

On February 6, 1989 approximately 260 gallons of commercial product hydrochloric acid was released from a storage tank and breached the secondary containment. A lime dike was constructed around the secondary containment berm to control the spill. The acid that remained inside the secondary containment berm was pumped into barrels and transported to the Wastewater Treatment Unit for treatment. Soil samples taken on February 13, 1989, revealed pH levels at 11.94, indicating a high concentration of lime in the soil. Subsequent soil samples taken on July 5, 1989 and September 19, 1989 showed pH levels of 6.93 and 6.66 respectively.

No other releases have been documented at the facility.

2.5 REGULATORY HISTORY

Barber-Colman filed a Notification of Hazardous Waste Activity on August 13, 1980 designating the company as a generator and treatment, storage, and disposal (TSD) facility (Barber-Colman, 1980a). On their Part A Permit, filed on November 17, 1980, the facility stated that 13,000 pounds of F007 wastes were stored in containers (S01) annually (Barber-Colman, 1980b). Barber-Colman re-submitted their Notification of Hazardous Waste Activity on January 7, 1987 and subsequently re-submitted their Part A Permit on the same date (Barber-Colman, 1987a,b). The new Part A stated that 1 ton each of D003, D006, and D007 wastes; 2 tons each of F007 and F008 wastes; 3 tons of F001 waste; and 4 tons of D001 wastes are stored (S01) annually. The treatment (T01) process was not included on the amended Part A application because it represented a wastewater treatment unit which is not regulated under RCRA. The change of facility ownership was not mentioned in the Part A application. Facility representatives could not explain the discrepancies between the wastes listed on the Part A Permit and actual wastes managed at the facility. Barber-Colman filed a Closure Plan on September 25, 1987 to close 4 separate S01 container storage areas (SWMUs 1 through 4). Their Part A Permit was withdrawn May 5, 1988, when it was determined by IEPA that the Closure of the S01 container storage areas satisfied RCRA requirements (IEPA, 1988a). Barber-Colman is now regulated by IEPA as a generator only.

A January 5, 1983 IEPA inspection revealed the following violations of 35 Illinois Administrative Code. The company did not have inspection records, training records, a contingency plan, or a closure plan (IEPA, 1983). A May 22, 1985 IEPA inspection showed Barber-Colman did not have a waste analysis plan, inspection records, training records, contingency plan, closure plan, weekly inspection reports, incompatible wastes were stored together, and no placards were available for the transporter (IEPA, 1985). These are all violations of 35 Illinois Administrative Code. On November

11, 1986 IEPA again inspected the facility and found the following violations of 35 Illinois Administrative Code. The facility failed to list caustic sludge on their Part A; failed to have a waste analysis plan; failed to place "Danger - Unauthorized Personnel Keep Out" at storage area; and a storage area did not have an internal alarm (IEPA, 1986). Additional violations of 35 Illinois Administrative Code were observed during a January 29, 1988 IEPA inspection. Barber-Colman failed to have a written evacuation plan and a list of emergency equipment (IEPA, 1988a). RAI could not locate any information stating if any of the above mentioned violations had been resolved.

Barber-Colman currently has an Operating Permit to operate emission sources and/or air pollution control equipment for their production processes. This permit expires May 30, 1996 (IEPA, 1991). The facility does not have scrubber or baghouse units. Barber-Colman previously had a NPDES permit; but, since 1984, the facility has no longer discharged to the Rock River, so a NPDES permit is not required. No violations of the above mentioned permits have been identified.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Barber-Colman facility.

2.6.1 Climate

The site is situated in Rockford, Illinois in Winnebago County. Rockford is the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to the airmass flow, the climate in the area is typically continental with cold winters; warm summers; and frequent short periodic fluctuations in the temperature, humidity, cloudiness, and wind direction (Ruffner and Bair, 1985). The average daily temperature is 47.8°F. The lowest average daily minimum temperature is 9.8°F in January. The highest average daily maximum temperature is 91.9°F in August. The prevailing wind direction is west-southwest and the average wind speed is 9.9 miles per hour. Average annual net precipitation is 5.44 inches. In winter, about one half of the precipitation, or 10 per cent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The general direction of surface flow is toward the Rock River which lies immediately east of the facility and flows from north to south. The terrain has a slope of about 40 feet over a distance of 0.8 mile, providing effective relief for surface runoff. The site locale is classified as a Zone A flood plain, that is, an area with a greater than one percent probability of flooding in any given year (FEMA, 1982).

2.6.3 Geology and Soils

Winnebago County is characterized by broad, rolling glaciated uplands that rise 100 to 200 feet above the valleys. The bedrock along the Rock River in the Rockford area lies buried beneath glacial deposits that are up to 300 feet thick (Anderson, 1967). These glacial deposits consist of sorted sand and gravel, with some finer material, and are known as valley train deposits (Berg et al., 1984; Hackett and Bergstrom, 1956). The facility is surrounded by buildings, parking lots and pavement which prevent complete identification of the geological features. The area's drainage characteristics are well graded so that surface water drains to edges of lots and finally into the storm water drainage system. As a result of construction, the water carrying capacity and permeability of the soil varies and is generally considered low to moderate. Runoff is considered moderate to high because of the steep slopes and the proximity of the Rock River.

The sand and gravel deposits in the Rock River Valley near the site are approximately 150 feet thick. The bedrock units underlying the glacial drift are marine sandstones, shales and dolomites, with an approximate total thickness of 2,000 feet. These rocks were deposited in the interval 520 to 400 million years ago, during the Cambrian, Ordovician and Silurian periods of the Paleozoic Era. The uppermost bedrock units in the vicinity of the site are dolomites of the Galena-Platteville Formation, and these are underlain by the Glenwood-St. Peter sandstones.

2.6.4 Ground Water

In northern Illinois ground water resources are available from four major aquifers, including: (1) sand and gravel aquifers in the glacial drift; (2) the dolomite aquifers, consisting of the Galena and Platteville Dolomite groups; (3) sandstone aquifers consisting of the Glenwood-St. Peter and Ironton-Galesville Sandstones; and, (4) the deeper Mt. Simon aquifers, consisting of the Mt. Simon Sandstones

of the Eau Claire Formation (Berg et al., 1984). In the site vicinity, excellent sand and gravel aquifers occur. Municipal and industrial supplies are obtained from up to 150 feet of coarse sand and gravel (Hackett and Bergstrom, 1956).

The Galena-Platteville Dolomite group constitutes the uppermost bedrock in Winnebago County, and is probably the most widely used bedrock aquifer for domestic supplies, although the deeper sandstones are the most dependable source for large quantities of ground water. Because of their widespread distribution, consistent water yielding zones and shallow position, the dolomites provide water to most of the wells through joints and fractures close to the land surface. The average thickness of drift over the dolomite is 30 feet and the average depth of wells is 104 feet. Reported well yields range from 5 to 40 gallons per minute (gpm) with an average yield of 20 gpm. Penetration into dolomite from about 20 to 100 feet yields satisfactory water supplies. Where the drift cover is relatively thin, dolomite aquifers are very sensitive to contamination because water moves through the joints and fractures and there is little opportunity for filtration through granular materials (Berg, et al., 1984). In close proximity to the Rock River, the drift deposits are underlain directly by the St. Peter sandstones, due to removal of the dolomites by erosion.

The St. Peter, Ironton-Galesville and the Elmhurst-Mt. Simon Sandstones furnish large quantities of water. Deeper aquifers are used only for larger municipal and industrial water supplies. The St. Peter Sandstone, the shallowest of the three aquifers, is used for domestic ground water supplies and is present at a depth of approximately 150 feet below the land surface near the site (Berg, et al., 1984). The general flow of ground water is from west to east towards the Rock River.

2.7 RECEPTORS

Barber-Colman is located in a light industrial area in Rockford, Illinois. Industry borders the facility to the north, south, and west while the Rock River is located immediately east of the facility. The nearest residences are approximately a quarter-mile to the west of the facility. The population of Rockford is 142,000. Public access to the facility is prevented by fences and locked doors. Individuals have to pass facility personnel to gain admittance to the facility.

The terrain in the vicinity of the site slopes toward the Rock River, located immediately east of the facility. The Rock River is primarily used for recreation. The facility and the community receive their water supply from shallow ground water wells located at a depth of 100 feet. However, the nearest well which is 0.8 mile southwest of the facility (downgradient), is 1,219 feet deep, into St. Peter

sandstone. Other than the Rock River, no other sensitive environments are located within two miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 10 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

SWMU 1 **Butler Building Storage Area**

Unit Description: This unit is located inside in the southwest corner of the property in Building 22 (Figure 2). It consist of a 21-foot x 31-foot area with a 2-to 3-inch thick asphalt floor. It was used as the final storage area for wastes generated at Barber-Colman (photo 1).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), chromic acid (D007), TCA (F001), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: The unit is located inside a building. There is 2-to 3-inch thick asphalt flooring and a 3-to 4-inch high asphalt containment berm located outside the east doors of the building. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented at this unit.

Observations: This unit has been closed since 1988. No wastes were observed at this unit. The asphalt floor had no cracks and appeared visually sound.

SWMU 2 **Cold Storage Area**

Unit Description: This 28-foot x 112-foot unit, south of Building 15 (Figure 2), has containment walls to the north, south, and east, while a 10-foot wide opening exists to the west. The floor is level and constructed of concrete. All wastes were stored in separate containers (photo 2).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), chromic acid (D007), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: During operation the unit was bounded on 3 sides by a retaining wall. A 10-foot wide opening to the west would allow a large spill to enter the asphalt parking lot. Asphalt curbs in the parking lot would contain the release. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented from this unit.

Observations: This unit was closed in 1988 and has since been converted to office space.

SWMU 3 **Carpenter's Shed Storage Area**

Unit Description: This 2,358-square foot unit is located in Building 15 (Figure 2). The area is enclosed on all 4 sides with 10-foot high overdoors located in the middle of the east and west walls (photo 3).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: The unit is inside with sound concrete flooring. If a large release were to leave the building, it would be contained in the same parking lot as SWMU 2. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented at this unit.

Observations: This unit has been closed since 1988. No wastes were observed at this unit. The concrete floor appeared visually sound.

SWMU 4 **Outside Earthen Storage Area**

Unit Description: This 10-foot x 30 foot area is located outside and southeast of Building 17 (Figure 2). The flooring consists of a crushed sand and gravel mixture (photo 4).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Plating cake (F006).

Release Controls: The plating cake was stored in 55-gallon drums and the drums were placed directly on top of the soil. There was no secondary containment. After closure, soil samples for heavy metals were taken in the center of the unit and results were below the cleanup levels specified in the approved closure plan.

History of Release: No release were documented at this unit.

Observations: This unit was used on 1 occasion to store 3 drums of waste. There were no wastes observed at the unit and no visual evidence of a release was observed.

SWMU 5 **Wastewater Treatment Unit**

Unit Description: This unit is located inside of Building 14 (Figure 2) and consists of 3 treatment units: a 2,000-gallon Batch Treatment System, a Continuous Treatment System, and a filter press. Treated wastes from the batch tank are pumped back into the plating lines when needed. The continuous treatment system is made up of a 700-gallon chromium conversion tank used to convert hexavalent chrome to trivalent chrome; a 700-gallon flocculation tank; a 3,000-gallon clarifying tank; and a 1,000-gallon sludge settling tank. Treated wastes are discharged to the sewer system, while the sludge is pumped to the filter press. Filter cake generated from the press is stored in the Plating Cake Dumpster (SWMU 6) and wastewater is pumped back into the treatment unit (photos 5 and 6). The tanks are constructed of polypropylene; the filter press is steel.

Date of Startup: 1984.

Date of Closure: This unit is currently active.

Wastes Managed: Wastewaters generated from the plating operations.

Release Controls: The unit is located inside. Any release would be contained inside the building.

History of Release: No releases have been documented at this unit.

Observations: The unit appears visually sound and no releases were observed during the VSI.

SWMU 6 **Plating Cake Dumpster**

Unit Description: This 20-cubic yard steel dumpster is located outside SWMU 5, separated by a wire fence along the bank of the Rock River. A plastic tarp covers the top of the unlined dumpster (photo 7). It is used for less than 90-day storage of hazardous wastes.

Date of Startup: 1987.

Date of Closure: This unit is currently active.

Wastes Managed: Plating Cake (F006).

Release Controls: The dumpster is constructed of steel and has a plastic tarp covering.

History of Release: No release has been documented at this unit.

Observations: During the VSI, RAI noticed that the plastic tarp was not over the entire top of the dumpster. The unit was clearly marked as containing hazardous wastes.

SWMU 7 **Waste Storage Area**

Unit Description: This storage unit is located in Building 17 (Figure 2) and consists of a 20-foot x 30-foot area on a concrete flooring (photo 8). It is used to store 55-gallon drums of wastes for less than 90 days.

Date of Startup: 1987.

Date of Closure: This unit is currently active.

Wastes Managed: TCA (F001), cyanide salts (F007), and spent quench oil (non-hazardous).

Release Controls: The unit is located inside underlain by a concrete floor. Drums are stored on wooden pallets.

History of Release: No releases have been documented at this unit.

Observations: During the VSI, no drums of TCA or cyanide salts were observed. The drums containing spent quench oil appear in sound condition and no evidence of a release was observed.

SWMU 8 **Battery Storage Area**

Unit Description: This area, located outside and south of Building 20 (Figure 2), was used to store used automobile batteries (photo 9).

Date of Startup: 1970.

Date of Closure: The unit has not been used to store wastes since 1987. It has not undergone formal RCRA closure.

Wastes Managed: Automobile batteries.

Release Controls: Batteries were stored on the open ground with no barriers between the soil and the batteries.

History of Release: No releases have been documented at this unit. However, no soil samples have been taken to determine the presence of lead or corrosive contaminants.

Observations: No visual evidence of a release was observed.

SWMU 9 **Paint Waste Storage Area**

Unit Description: This 10-foot x 10-foot area is located outside between Buildings 12 and 16 (Figure 2) and was used to store paint wastes from general maintenance painting (Photo 10). It is not known whether wastes were stored in this area for periods of greater than 90 days.

Date of Startup: Unknown.

Date of Closure: Barber-Colman has not conducted painting operations since 1984. Reed-Chatwood currently uses this area for storage of wooden refuse. The unit has not undergone formal RCRA closure. No painting activities currently occur at the facility.

Wastes Managed: Paint wastes (exact constituents unknown).

Release Controls: Wastes were stored outside on an asphalt parking lot. There was no secondary containment around the unit.

History of Release: No release has been documented at this unit.

Observations: During the VSI, no paint wastes were observed. The area is now used to hold general refuse.

SWMU 10 **Satellite Accumulation Areas**

Unit Description: These units consist of a 55-gallon drum of spent TCA, a 5-gallon bucket of spent quench oil, a 55-gallon drum of spent quench oil, and a 55-gallon drum of cyanide salts. Waste TCA from the vapor degreaser drains into the 55-gallon drum. The spent quench oil is skimmed off the top of the quenching tank and drips into the 5-gallon bucket. When the bucket is full, the wastes are transferred to the 55-gallon drum. Spent cyanide salt is dipped out of its tank with a ladle and the wastes are then poured into a 55-gallon drum. When all of the above mentioned 55-gallon drums are full, they are transferred to the Waste Storage Area (SWMU 7) (photos 11, 12, 13, and 14) to be stored for less than 90 days prior to hauling.

Date of Startup: 1980.

Date of Closure: These units are currently active.

Wastes Managed: TCA (F001), cyanide salts (F007), and spent quench oil (non-hazardous).

Release Controls: All of the containers are placed on a concrete floor and the TCA drum has a drip pan beneath it to contain any TCA that drips from the drum.

History of Release: No releases have been documented from this unit. Cyanide salts were observed by RAI personnel on the floor around the cyanide drum.

Observations: The containers appear old and are rusted in spots. Cyanide salts were observed on the floor around the drum during the VSI.

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 10 SWMUs and no AOCs at the Barber-Colman facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Barber-Colman facility and suggested further actions.

SWMU 1 **Butler Building Storage Area**

Conclusions: The storage area was located inside, and has a 2-to 3-inch thick asphalt floor. A 3-to 4-inch high asphalt containment curb is located outside the entrance doors, the only escape route for a release. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it most likely would have been contained inside the asphalt curb. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above mentioned environmental media is also low.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 2 **Cold Storage Area**

Conclusions: This area was used primarily as a staging area before wastes were transferred to SWMU 1. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it most likely would have been contained inside the curbed parking lot outside. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above mentioned environmental media is also low.

TABLE 3
SWMU SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Butler Building Storage Area	1980 to 1988	None	No further action at this time.
2.	Cold Storage Area	1980 to 1988	None	No further action at this time.
3.	Carpenter's Shed Storage Area	1980 to 1988	None	No further action at this time.
4.	Outside Earthen Storage Area	1980 to 1988	None	No further action at this time.
5.	Wastewater Treatment Unit	1984 to present	None	No further action at this time.
6.	Plating Cake Dumpster	1987 to present	None	No further action at this time
7.	Waste Storage Area	1987 to present	None	No further action at this time.
8.	Battery Storage Area	1970 to 1987	None	Conduct soil sampling for presence of corrosive or lead contamination.
9.	Paint Waste Storage Area	Unknown to 1984	None	Conduct soil sampling for presence of painting waste contamination.
10.	Satellite Accumulation Areas	1980 to present	None	No further action at this time.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 3 **Carpenter's Shed Storage Area**

Conclusions: This area was used primarily as a staging area for SWMU 1. It is located inside a building with a sound concrete floor. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it would have been contained inside the curbed parking lot outside. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above-mentioned environmental media is also low.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 4 **Outside Earthen Storage Area**

Conclusions: This 10-foot x 30-foot unit is located outside and was used to store 3 55-gallon drums of plating sludge. The drums were placed directly on the ground, a sand gravel mixture, before transfer to SWMU 1. During closure, 20 cubic yards of soil was removed from the unit and subsequent soil sampling revealed no contamination. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above-mentioned environmental media is also low.

Recommendations: Soil samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 5 **Wastewater Treatment Unit**

Conclusions: This entire unit is inside a building and is of sound construction. Any release from the tanks would be contained inside the building. Potential release to surface water, ground water, soil, or air is low.

Recommendations: No further action is recommended at this time.

SWMU 6 **Plating Cake Dumpster**

Conclusions: This unit is located outside, on the edge of the property, next to the Rock River. A plastic tarp covers the top of the unit, preventing rain water from entering it and wind from blowing the cake into the river. This unit poses a low threat for release to the surface water, ground water, soil, or air.

Recommendations: No further action is recommended at this time.

SWMU 7 **Waste Storage Area**

Conclusions: Spent TCA, cyanide salts, and quench oil are stored inside this unit. The concrete floor is sound and any release would be contained inside the building. No floor drains were observed in the area. Potential release to surface water, ground water, soil, or air is low.

Recommendations: No further action is recommended at this time.

SWMU 8 **Battery Storage Area**

Conclusions: The batteries were stored directly on top of the soil for over a period of about 17 years. It is not known if lead or acid from the batteries leached into the soil. There was no secondary containment to control a release, so past release potential to soil was high. The terrain in the area slopes towards the Rock River, located immediately east of the facility. Therefore, past release potential to surface water via runoff was moderate. Ground water is located in a shallow sandstone aquifer at a depth of 100 feet. Past release potential to ground water

was also moderate. Because the unit is no longer operating, current release potential to soil or surface water is low. Past and current potential for a release to air was and is low. If the soil is contaminated, then the current potential for an ongoing release to ground water is moderate. If the soil is not contaminated, then the current release potential to ground water is low.

Recommendations: The soil should be tested for possible lead and corrosive contamination. If the results are positive, then the extent of soil contamination should be defined and, if warranted, ground water should also be sampled.

SWMU 9 **Paint Waste Storage Area**

Conclusions: Little information was available on this unit. Facility representatives stated that Barber-Colman conducted painting operations up until 1984, when they were purchased by Reed-Chatwood. The wastes were stored in containers of unknown integrity and quantity, on asphalt, 500 feet west of the Rock River. Past release potential to the surface water, ground water, soil, or air was probably low. Because the unit is no longer operating, current release potential to soil, air, or surface water is low. If the soil is contaminated, then current potential for an ongoing release to ground water is moderate. If the soil is not contaminated then the current potential for a release to ground water is low.

Recommendations: Because the integrity of the containers and asphalt is unknown, it is possible that a release could have entered the soil through cracks and patches currently visable in the asphalt. Soil sampling should be conducted to determine the presence of contaminants.

SWMU 10 **Satellite Accumulation Areas**

Conclusions: Waste quantities are minimal and the drums have lids and are stored inside on concrete flooring. Potential release to the surface water, ground water, soil, or air is low.

Recommendations: No further action is recommended at this time.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 145 958

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Barber-Colman Company, Colman Metal Finishing	1300 Rock Street				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Rockford	IL	61101	Winnebago		
09 COORDINATES: LATITUDE	LONGITUDE				
42 15 32.N	89 05 53.W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

State Highway 2 south to Montague Street, east to Rock Street, south to the facility.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Reed-Chatwood, Inc.	P.O. Box 1200		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Rockford	IL	61105-1200	(815) 968-6833
07 OPERATOR *(if known and different from owner)*	08 STREET *(Business, mailing, residential)*		
Barber-Colman, Colman Metal Finishing	1300 Rock Street		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Rockford	IL	61101	(815) 968-0660

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 / 14 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 04 / 23 / 91
☐ NO

BY *(Check all that apply)*

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION		
■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1905 (BEGINNING YEAR)	Present (ENDING YEAR)	☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Cyanide, nickel, copper, aluminum, hydrochloric acid, caustics, zinc chloride, and quench oil.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility is located in a light industrial area of Rockford. Any release from the SWMUs located inside would be contained inside the building. The plating cake stored outside is inert and poses little threat of release.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Jeff Indeck		Resource Applications, Inc.	(312) 332-2230	04 / 23 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 145 958

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ■ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ■ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS 20

NO. OF DRUMS 8

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ■ A. TOXIC
- ■ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ■ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	20	cubic yards	shipped off-site for disposal
OLW	OILY WASTE	6	55-gallon drums	shipped off-site for treatment
SOL	SOLVENTS	1	55-gallon drums	shipped off-site for disposal
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	Copper	7440-50-8	Plating Cake	Unknown	
	Aluminum	7429-90-5	Plating Cake	Unknown	
	Cyanide	57-12-5	Drum	Unknown	
	Hydrochloric Acid	7647-01-0	Waste Water Treatment Unit	Unknown	
	Nickel	7440-02-0	Plating Cake	Unknown	
	Zinc Chloride	7646-85-7	Plating Cake	Unknown	

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Barber-Colman, 1980b. Part A Permit application, November 17.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 145 958

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

Low potential for release to ground water. Operations are inside a building.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

Low potential for surface water contamination. Waste stored in Plating Cake Dumpster next to the Rock River is inert and poses a low threat to to enter the river.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _

04 NARRATIVE DESCRIPTION

Low potential for contamination of air. Operations are inside a building.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _

04 NARRATIVE DESCRIPTION

None identified. The facility does not use explosive material.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

Low potential for direct contact. Operations are located inside a building.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ *(Acres)*

04 NARRATIVE DESCRIPTION

Low potential for soil contamination. Operations are located inside a building.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

Low potential for drinking water contamination. Operations are located inside a building.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

Employees work near toxic, caustic, and acidic substances. There is a potential for employee contact with these substances.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _

04 NARRATIVE DESCRIPTION

Low potential for population exposure. Operations are located inside a building.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 005 145 958

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: __

IV. COMMENTS

The SWMUs at this facility pose a low potential for release.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Barber-Colman, 1980b. Part A Permit application, November 17.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

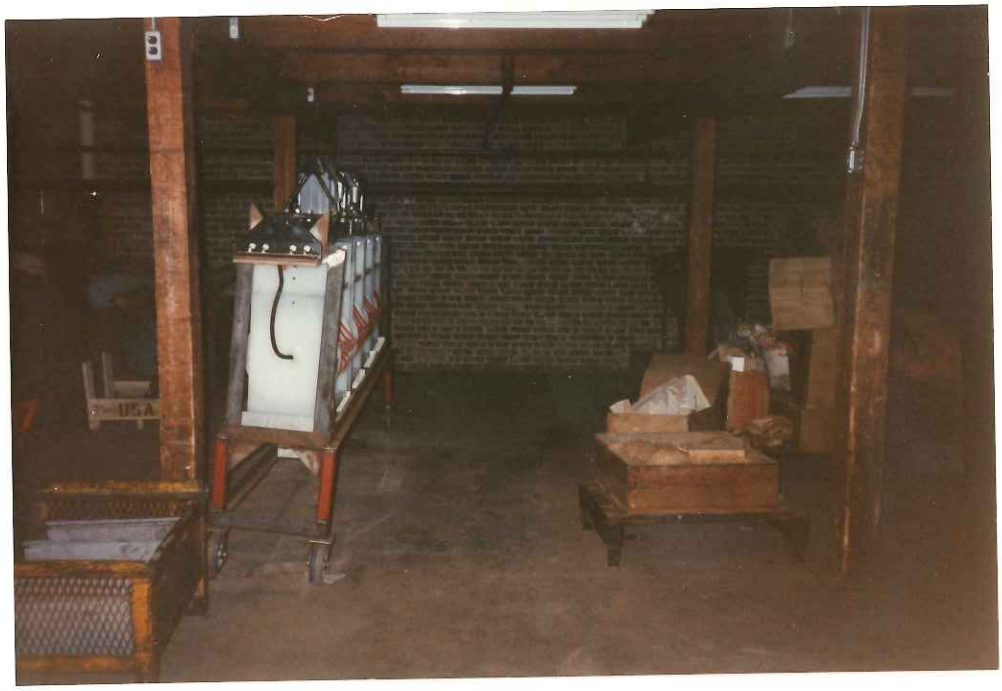
VISUAL SITE INSPECTION SUMMARY

Barber-Colman Company
Rockford, IL
ILD 005 145 958

Date:	April 23, 1991
Facility Representatives :	Kirit Patel, Barber-Colman Laurens Petersen, Barber-Colman
Inspection Team:	Jeff Indeck, Resource Applications, Inc. Cynthia Tarka, Resource Applications, Inc.
Photographer:	Cynthia Tarka
Weather Conditions:	Raining, Temperature 50°F.
Summary of Activities:	RAI conducted a VSI at the Barber-Colman facility at 9:15 A.M. on April 23, 1991. Kirit Patel and Laurens Peterson explained the facility's operating procedures and waste management practices. The tarp covering the Plating Cake Dumpster was not in place. Some cyanide salts were observed on the floor around the satellite drum. The VSI concluded at 2:45 P.M.

Photograph No. 1 **Location: SWMU 1**
Orientation: Southwest **Date: 04/23/91**
Description: This storage area in the Butler Building was closed in 1988.

Photograph No. 2 **Location: SWMU 2**
Orientation: West **Date: 04/23/91**
Description: This is the former Cold Storage Area. After closure in 1988, it was converted to an office.



Photograph No. 3 **Location: SWMU 3**
Orientation: North **Date: 04/23/91**
Description: This is the Carpenter's Shed Storage Area. It was also closed in 1988.

Photograph No. 4 **Location: SWMU 4**
Orientation: Northwest **Date: 04/23/91**
Description: This is the Outside Earthen Storage Area. It was also closed in 1988.

Photograph No. 5 **Location: SWMU 5**
Orientation: West **Date: 04/23/91**
Description: This the pH adjustment tank in the Wastewater Treatment Unit.

Photograph No. 6 **Location: SWMU 5**
Orientation: Northwest **Date: 04/23/91**
Description: This is the Filter Press associated with the Wastewater Treatment Unit.

Photograph No. 7 **Location: SWMU 6**
Orientation: Northeast **Date: 04/23/91**
Description: This is the Plating Cake Dumpster that stores plating cake generated from SWMU 5. The top of the unit was not covered during the VSI.

Photograph No. 8 **Location: SWMU 7**
Orientation: Northwest **Date: 04/23/91**
Description: This is the Waste Storage Area. No hazardous wastes were stored here during the VSI.

Photograph No. 9 **Location: SWMU 8**
Orientation: East **Date: 04/23/91**
Description: This is the Battery Storage Area. It has not been used since 1987.

Photograph No. 10 **Location: SWMU 9**
Orientation: Northwest **Date: 04/23/91**
Description: This area was used to store painting wastes. It has not been used since 1984.

Photograph No. 11 **Location: SWMU 10**
Orientation: West **Date: 04/23/91**
Description: This is a 55-gallon drum used to collect spent TCA. Note the drip pan below the drum.

Photograph No. 12 **Location: SWMU 10**
Orientation: Northeast **Date: 04/23/91**
Description: This is a 5-gallon bucket used to collect spent quench oil.

Photograph No. 13 **Location: SWMU 10**
Orientation: Southwest **Date: 04/23/91**
Description: The 55-gallon drum marked "Hazardous Waste" contains non-hazardous quench oil. Wastes from the 5-gallon bucket (photo 12) are transferred into this drum.

Photograph No. 14 **Location: SWMU 10**
Orientation: Southeast **Date: 04/23/91**
Description: This drum contains spent cyanide salts. Note cyanide salts on the floor.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

4/23/91 9:15 a.m. 3

Arrived at Barber-Colman (B-C) @ 9:15 a.m. on April 23, 1991. The site is in Rockford Illinois. The whole property is owned by Reed Chatwood, Textile manufacturer. (many weaving yarn machines) We (Jeff Indeck & myself - Cindy Yerka) met w/ 2 employees of B-C's division "Colmon Metal Finishing" (CMF) in the Reed Chatwood (RC) Lobby & meeting room.

MEETING

B-C CMF Kirit Patel Supervisor QA and Laurens "Pete" Petersen Manager.

Meeting:

9:25 am Jeff explained why we were there & revealed some site history and SUMA information.

BCCMF explained that they are a separate legal entity from RC. Their relationship stems from the fact that B-C use to own the whole facility & property - but sold the property, facilities & the

CT 4/23/91 9/91

(textile division)
assets of the textile machinery & manufacturing to RC in 1984. B C now leases space from RC.

Jeff asked about the & SWMUs that are now in areas owned by RC and NOT being leased by B.C. Mr. Peterson said we could get access to these areas too, to look around & photograph.

Pete explained (using the map we brought) that the SWMU area in the Barber bldg was also used by RC & a company called "Image Technology" which makes circuit boards. All 3 co's used that area for storage prior to closure. They divided it up into 3 areas. The area is now a parking area.

Pete reiterated that the only bus relationship between B-CMF & RC is limited to: BC supplying plating & heat treating services to RC
: RC supplying utilities, steel cutting & some electrical repair services to BC.

CT 4/23/91

BC does 3 processes: (1) rotor finishing (de-burring & blasting)
(2) heat treating
(3) electroplating

* The bulk of the SOLID HAZARDOUS WASTE comes from the electroplating processes

Jeff explained that the EPA is interested in the areas (1) where haz waste is managed (SWMUs)
(2) process areas - where product is stored (because of release potentials)
(3) Areas of Concern where either haz. waste or product could or chemicals from the process could be released

B-C reviewed a list of chems used in the process (from the closure plan) & marked which chems are or are no longer being used.

BC said: Ni SO4 & Ni Cl used to be used & disposed of - but not any longer
: Cyanide is still used
: the list still applies to the current processes, but
: most of the chemicals in bulk is HCl

B-C CMF does have 2 air PERMITS (1) for plating (2) for heat treatment

CT 4/23/91

4

BC just recently sent the Air permits to IEPA for renewal.

B-C no longer needs to file NPDES because it owns the facility

B-C CMF is a division of B-C. Permits are filed under B-C's name. The main plant is in Loves Park (Rockford).

RE THE MAP:

Heat Treatment - (A)

product & Chem Storage - Sect 17

Sulfuric kept in - (B)

2 tanks HCl

Sect 5 has offices & a lab on the 3rd fl

PROCESSES:

I De-burring - in: stones, water, metal products go in. - vibration machine. The stones polish the edges of the metal

- out: rounded smoothed metal product comes out. The effluent is regulated by the local Sanitary district & it meets the IPPM + goes down the drain. Sanitary system & ~~outside~~ B-C splits samples to test for Pb of effluent

CT 4/23/91

5

II Heat treatment:

3 heat treating pots

requires AIR PERMIT

1) Atmospheric furnaces

Endothermic - heating elements - to control the Carbon content - the metal products are heat treated

PRODUCT GAS (IN)

burned off (NO OUT put gas wst)

2) Archalyzing Pots

50% cyanide salts & carbonate (IN)

wst must goes into labeled drum (OUT)

Either CARBONATING or CYANIDE POTS

3) Induction Heating

Small parts heated w/ coil & quenched w/ oil (quenching oil)

Quenching oil is recycled by OUTSIDE grps

4) Vapor Degreaser

uses TCA to degrease parts. It does have a cooling component.

- when waste drums are filled they are moved to a secondary area & manifested w/in 90 days.

Annually - 3 barrels worth (not all are full - so 4 barrels manifested / year)

CT 4/23/91

6

Pb Rls · generates a solid waste?
by selective hardening
It's NOT removed because
? Carbon? put on 90s
to keep it in?

III Electroplating

Different tanks for
REQUIRES AIR PERMIT different types of plating
(doesn't pump into other
tanks)

clean tanks?
Only when ie. HCL goes bad, may
need to transfer it to another tank
for treatment (pump it out) & then
clean tank & pump it back.
This only happened one time in '91
w/ rap plating line (upper plating line)
This only happen once every 1-2 yrs.
ie. $ZnCl_2$ was changed 4-5 yrs ago
'91 change bath cost $1500

Waste samples
are analyzed outside before sent to B.
TSD also does analysis

TRANSPORTERS
use the same 3-4 haulers
ie Hydrocede for organics
CET hauler from Clyo
(inorganic?)
Did get an extension once when TSD had a fire — yet still manifested w/in 90 days

7

BC CMF has a lab onsite But
BC says the lab does NOT
generate any wsts. LAB does NOT
do any R&D.

— OLD SPILLS

- Old product storage tanks
– had HCl & another of SO_4. PVC
pipe was broken by kids throwing
stones – spill occurred & was
cleaned up. New tanks built
tanks are lined & raised w/ double
containment piping

- Yellow chromium spill –
Neither Pete nor Kirt were
familiar w/ this spill on 5/23/85
It could have been inside the
plating area

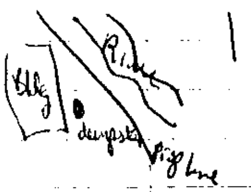
- Battery Storage Area – near
garage? Uncertain if it was KC's responsibility
They think it was B-C's responsibility

– closure: 4 areas were closed in '88
3 paved areas } only 2 were really
1 soil area } used

- Storage area – outside Sect. 17 – never used
- Major storage was in Sect ?22 next plating?
where there is now a roof and enclosure
between Section 14 & 15

[illegible] 4/28/91

< 90 day storage in Sect. 17
- Most waste is stored in 55-G drums
- Other waste is plating sludge 20 cc
  stored near property line next to river



(it is filter cake f little hopper inside dumped into big hopper outside by forklift)

Years ago, used to have 1-2 tanks? u/sand?
MARVIN Clark BC 817-0241
WAYNE GARTMAN RC may be available today

- toluene contaminated tank?
  Neither POZ nor KIRIT were familiar w/ this
  speculated: it was paint constituent of RC's
  or old carbonating heat treatment

PRETREATMENT OF WASTE WATER
for the sanitary district
precipitate + neutralize metal hydroxides
into - filter CAKE plating sludge residue
TRANSPORTER: Envirite for more treatment

PRETREATMENT OF: plating waters
Batch treatment waters
Pickling acids

CT 4/23/91

To neutralize at ? change PH

neutralize + precipitate Baths ??? How are wastes removed ??
NaOH
CaOH (lime) } for BATH changes

waste treatment changes hexavalents to trivalents using NaS_2 reducing agent (sodium bisulfite)

- We looked at copies of the AIR PERMITS
- They do not have an impact ASSESSMENT on releases to the environment
- They have minimized their CYANIDE PLATING BATHS because of their proximity to the River
- Although the plating lines are well contained, they have a greater potential for release than the heat treatment process
- They are self-insured under BC

There has been no flooding since 1920'
They think the floodplain map we had hasn't been updated to show new dams + fact that probably no flooding in 100 years

B-C opened here @ 1905

CT 4/23/91

Bldgs being leased were built in 1930-1940's
Sect #s on the bldgs are by
chronological age 1 - -

MANIFEST REVIEW

Date?			Vol
1/91	F006	haz solid	20/2
	D001 910450	hz wst combust	55G
2/91	906520	naptha combustlq	55G
" "	908790	TCA combust lq	110G
4/91	F006	haz solid	20/2
2/91	F002	TCA	330G
	D003	cyanide dig	55G
	F007	Cu cyanide soln	495G
4/91	F006	haz sold	20/2

Haulers include:
Treatment One
Envirite
Aragenic Industries

whole area on map - shows
it is fenced
Inner gates @ some Bldgs

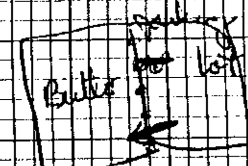
CT 4/23/91

VS I 4/23 @ 11:20 Light conditions: overcast, rainy, occasional sun

Began on 3rd floor of Bldg Sect 5
Labs where they said no haz waste.
area of atomic absorption

Picture Number

(1) LAB Sect 5 Process area for testing
Chemical product storage area —
(NW) for testing
red containers labelled TCA
they pour TCA from glass bottle
into red containers kept under
small table
AOC



(2) South (SW) Butler Bldg 2nd to lot
3 paved Bays were part of the same but
B-C only used 1 1/2 bays closest to door — other
1 1/2 bays used by RC + Image Tech

BC stored: TCE?, Ni filter, chromic
acid, SO4, trench waste oil

For closure this area was washed
scrubbed + tested clean
samples analyzed by outside grp

CT 4/23/91

This area is owned by Read Chatwood.
The closure only involved the 1½ bays B.C. used.
The other 1½ bays were (apparently not part of the closure
owner/operator conflict but BC closed it b/c they felt responsible
Read Chatwood stored paint sludge & degreasers there
Image Tech stored SO_4, Cu in small quantities.

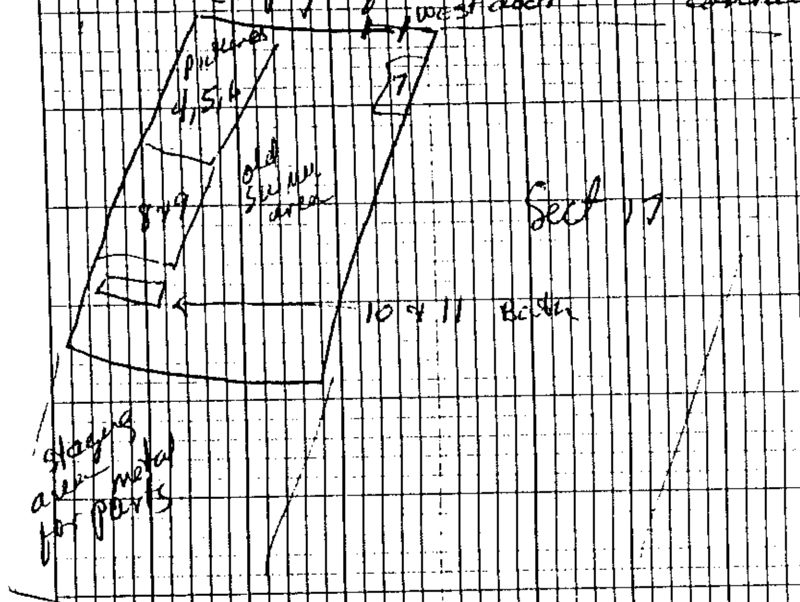
Area now is empty except for a Boat stored in the bays previously used by RC & Image Tech

4,5,6 near SW (west) door Pictures of raw chemical product stored in sect 17 (SW part of bldg)

7 Same area - across from mass storage. This is where some big barrels of raw product had hand pumps on them to take out chemicals. Picture shows Na bisulfate which is pumped into smaller containers & used elsewhere

CT 4/23/91

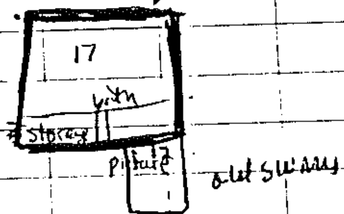
8,9 Also in Section 17 next to product storage
Waste storage area where waste kept before it is manifested. (Quenchol is non-hazardous & is recycled by a company) This area was empty of hazardous waste containers



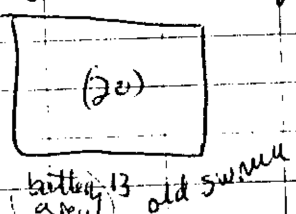
10,11 Temp. Plating Bath staging area for metal product racks & outgoing parts, also has the temporary plating bath
Plating Bath ≈ 400 g hard nickel residue (green) inside. It was on a wood platform

CT 4/23/91

12 Storage area on SE outside of Sect 17 - B-C said they never used this area. Area is @ 20 X 30 ft

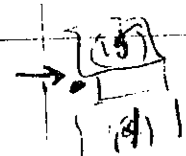


13 Old Battery and tank area It is now a parking lot. There is a fireplug nearby
South side outside of Sect 20



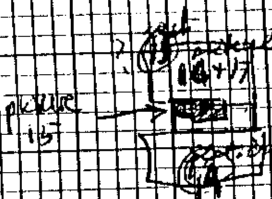
(1) old tank area old swmu is pkg lot

14 Show a picture of another portable plating bath ~~outside~~ (W) of area in between Sect 14 + 15 This bath has a cover



CT 4/23/91

15 Old SWMU area (West) part of bldg
In between Sect 14 + 15
This area was supposedly always roped & is now enclosed connecting the 2 bldgs. Upon entry from the door there is an office where the old SWMU storage area was 14 X 14' from door to back wall of office



This area was used to store Ni filter, trench sludge, $ZnCl_2$, staging area - used heavily years ago. No RCRA was kept here. The office was here for 1½ yrs

16 + 17 2 Bays in Sect 14 (behind office) on N side of Sect 14 (15) North bldg used to store Ni filters etc
1st Bay used by B-C west bay
2nd Bay used by RC east bay
It isn't used much now, But plan on leasing more of this space soon.

CT 4/23/91

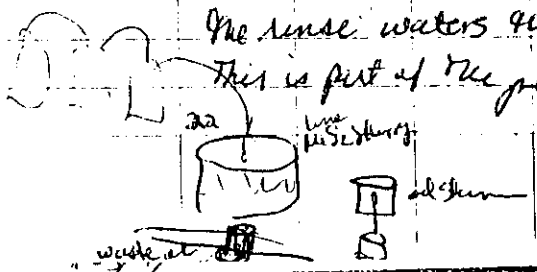
N side of Sect 18?

18, 19 Nickel Plating tanks in Sect 18 Shows spill containment trench w/ metal grates Also shows green Ni spill on floor. (There are drogout lines)

20 Across (East) of Ni baths are the Black Oxide Plating Tanks Picture shows platform up to area w/ containment that runs into containment trough in work area

21 Barrel (bucket) of chromic acid & water mix - when bath is too full - they put some in these containers - water is added for the bath. This is an ACC

22 Picture of the lime & NaS_2 slurry mix in a vat. This is pumped into the rinse waters to neutralize them. This is part of the pre-treatment



CT 4/23/91

23 Oil skimmer next to the lime slurry vat. There is a bucket under it collecting waste oil

24 Oil waste is in a 55 G barrel marked Hazard Waste. When it is filled it is removed for disposal. This barrel is directly across from the oil skimmer in the pretreatment area

25 NaOH and SO_4 & polymers added to neutralize pH & plating waste which are removed from pretreatment waters. The resulting filter cake is extracted into a small hopper

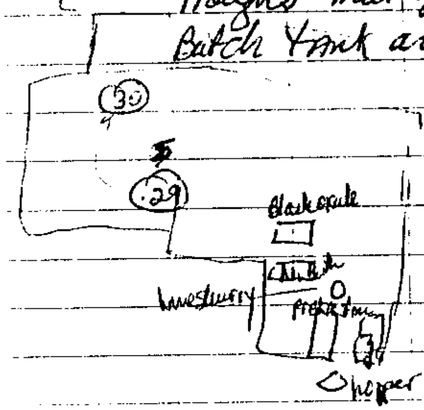
25 At end of pretreatment line near SE door of Sect 19 (by River) filter cake (hazardous waste) is put into a small hopper It is non reactive & contains Chromium & Nickel

26 Big hopper directly outside S of Bldg 19. It is at edge of property next to fence along the Rock River. It was receiving the hopper was

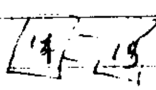
CT 4/23/91

occurred when we took the picture. Filter cake is sent to Envirite for treatment & disposal

27 Zn baths shows containment trough (along side pretreatment area) (in back of the ~~black oxide tanks~~)
occassionally B-C cleans the troughs that go to through the Batch tank areas



28 Zn lines w/ rinse waters



29 roto finishing is across from the Zn Baths in
Shows vibrator & steam condensate

CT 4/23/91

30 Chrome plate sealing uses chromium soln - with chemically bond Cr soln to seal metal parts (near roto finishing

31 HCl tanks outside on embankment in between Sect 15? & Sect 13. These tanks hold HCl product in rust resistant double contained vats. Has lines for pumping in & out. (Tanks are high density polypropylene)

32 Sect 16 Atm furnaces will quench metal w/ oil after its heat treated. Quench oil is residue - B-C says its non-hazardous this is a [illegible] process!

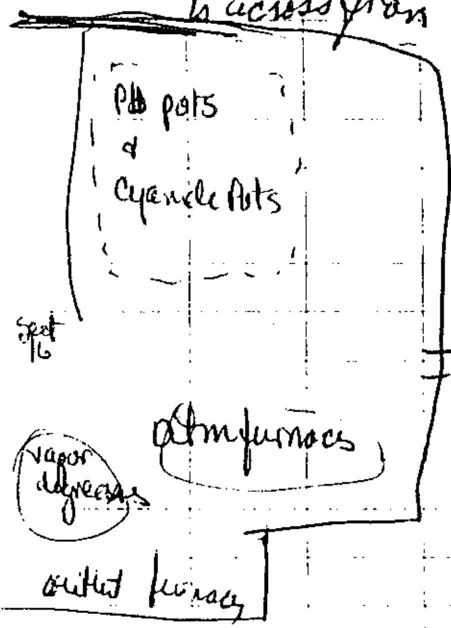
33 Cyanide & Pb pot area
Picture of ladel used to dip out waste cyanide pot into waste barrel - white is dried cyanide

CT 4/23/91

20

34 Shows hay. wst cyanide drum + spill (white dried cyanide power) — Barrel will be taken to Sect 17 for removal when its full

35 Vapor degreaser TCA for degreasing is across from the atm furnace



It is a 55-G drum on its side w/ pump (+ drip bucket) pumps TCA into degreaser

36+37 Waste TCA + oil comes out into unmarked TCA barrel There is a drip pan under barrel w/ drips in it. It is poured w/ funnel back into drum when its removed for disposal

[illegible] 4/23/91

21

38 Old tank area HCl + [illegible] tank area outside on E side of Sect 19 + 15 where tracks are by property line This is where kids threw stones + broke the pipe leading to the tanks + causing a spill. Picture shows stain on wall where acid bugged from the pipe

New roll of film
Picture Number

1,2 Outside S of Sect 12 where paint waste was storage. It is almost empty paved area of wood slat refuse on it. Apparently it was not used since [illegible] or [illegible] were there > 85 + was not part of the closure. Nothing hay is stored there. This area is NOT leased by [illegible]

3,4,5 In Sect 12 - almost in Sect 13 on north side in between former area where underground

[illegible] 4/23/91

storage tank was. That area
is not leased by B-C

We returned to lobby of RC
& ~~then~~ left the facility around
2:45
CT 4/23/91

6/14/91
VST Barker Chemical Co II
2500 S. Sensur - Chgo IL

Conditions: sunny, hot, breezy
80-85°

current owner of the property is ~~re~~ do
Sherwin Williams.

Present: Gabrielle Norkis, RAI 1. on
Cindy Tarka, RAI 2. other
page
Sheri Bianchin, RCRA-EPA
Nick Maplosic, Corp. Environ Dir - Sherwin
Rob Martin, Environ Mgr Chgo - Williams

Mr. Martin told RAI that he had been
to this property once before < 5 yrs. ago.

While we waited for Mr Martin to
make a phone call, RAI & EPA met
Grant Crawley, Crawley's Yacht Yard, from
the neighboring property. We asked
Mr. Crawley what he knew about the
property and Barker Chem Co. Mr
Crawley stated that he had toured the
property in the late 70's before Barker
bought it, and it was very clean!
He did not remember much of a
stop-gap between the time Sherwin
Williams sold it to Barker. He stated
that Barker's operation was

CT 6/14/91

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: BARBER COLMAN COMPANY

EPA I.D. NUMBER: ILD070168968

LOCATION CITY: 1351-WINDSOR RD - LOVES PARK

STATE: _____

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area	X	
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available. (see attached)

(1) Waste freon (TF4) hazardous waste liquid N.O.S.- F-002; accum. started 1/1/86; disposal 5-6 barrels quarterly.

(2) Wash Gas (rule 66) - hazardous waste conbustible liquid - Kool; accum. started 1/1/86 disopal 15-20 barrels quarly.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None have occurred.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

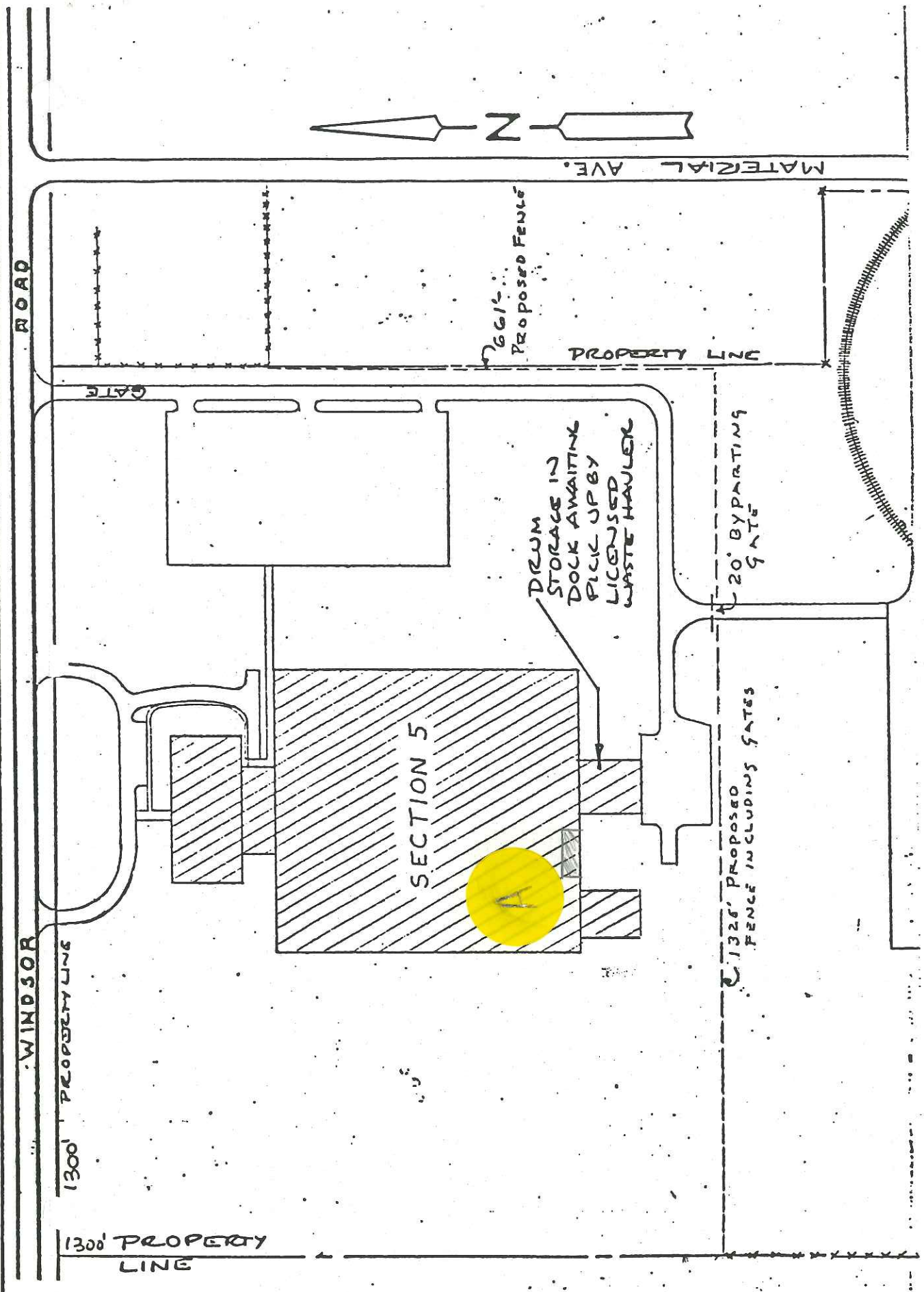
None

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

E.W. Terneus Mgr. Corp. Facility Services
Typed Name and Title

E.W. Terneus for Barbara Colvin — 2-4-86
Signature — Date

Attachment
(1) Plot Plan



A storage - 55 gal. barrels - solvent + freon

SCALE 1IN = 200'

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: BARBER COLMAN COMPANY

EPA I.D. NUMBER: ILD073163963

LOCATION CITY: 1351-WINDSOR RD. - LOVES PARK

STATE:

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area	X	
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available. (see attached)

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NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None have occurred.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

None

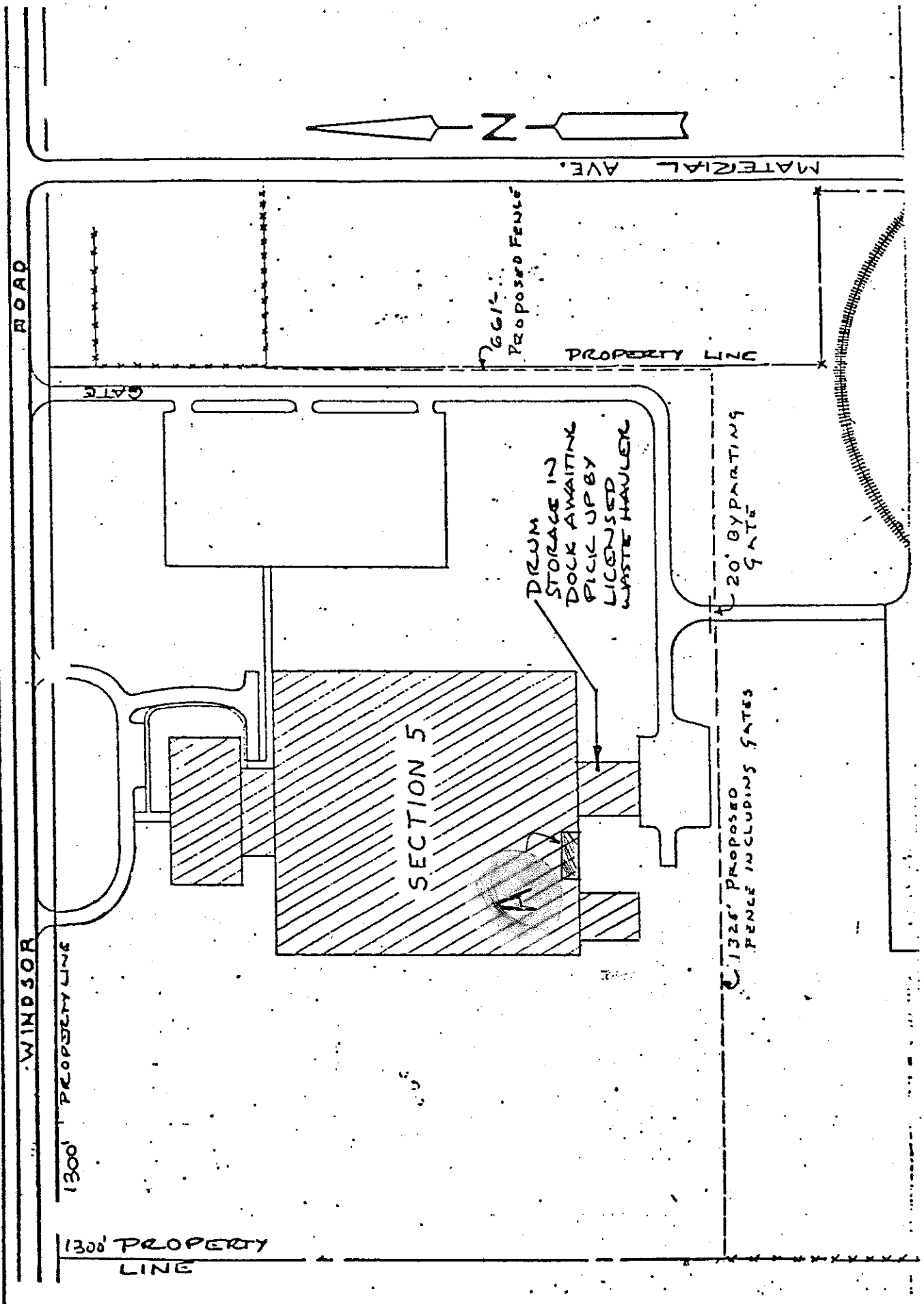
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

E.W. Terneus Mgr. Corp. Facility Services
Typed Name and Title

E.W. Terneus for Barbara Colvin
Signature

2-4-86
Date

Attachment
(1) Plot Plan


N
MATERIAL AVE.
ROAD
WINDSOR
PROPERTY LINE
660' PROPOSED FENCE
GATE
DRUM STORAGE IN DOCK AWAITING PICK UP BY LICENSED WASTE HAULER
20' BY PARTING GATE
SECTION 5
A
1326' PROPOSED FENCE INCLUDING GATES
1300' PROPERTY LINE
1300' PROPERTY LINE
A Storage - 55 gal. barrels - solvent + freon
SCALE 1IN = 200'

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HR-12

April 4, 1991

Mr. Kirit Patel
QA Supervisor
Barber-Colman CMF
P.O. Box 2940
Loves Park, IL 61132-2940

Re: Visual Site Inspection
Barber-Colman CMF
ILD 005 145 958

Dear Mr. Patel:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for April 23, 1991. The inspection team will consist of Jeff Indeck and Cynthia Tarka of Resource Applications, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Kenneth S. Bardo

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Robert A. Wengrow, IEPA - Division of Land Pollution Control, Rockford
Larry Eastep, IEPA - Division of Land Pollution Control, Springfield

ATTACHMENT

Barber-Colman Company
Colman Metal Finishing
P.O. Box 2940
Loves Park, IL 61132-2940

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

   From the list of probable SWMUs please address the following questions:

   - Do the above SWMUs still exist at the facility and are they in operation?
   - What are the start-up and closure dates of the above SWMUs?
   - What types of wastes are the SWMUs currently/formerly used for?
   - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.

2. Please supply as much information as possible concerning the site history. This would include any information you have regarding operations and any other owner/operators at this location.

3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.

4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.

Facility Name Barber Colman Co
Location (City, State) Loves Park, IL
EPA I.D.# ILD 005 145 958
Reviewer Name BF
Date of Review 3/17/86

SUMMARY OF FACILITY CERTIFICATION
REGARDING POTENTIAL RELEASES
FROM SOLID WASTE MANAGEMENT UNITS

(1) Are there any solid waste management units?

Yes X No _____ Undetermined _____

(2) If answer to (1) is Yes, list the units by type, number and operating status. If answer to (1) is No or undetermined, go to Question (5).

	Type of Unit	Status
a.	storage tank (above ground)	active
b.	storage tank (above ground)	active
c.	containers	active
d.	Containers	active
e.	Wastewater treatment	active
f.		
g.		
h.		
i.		
j.		

(3) For each type of unit listed in (2), summarize the types and volumes of wastes handled.

	Type of Unit	Type of Waste	Volume of Wastes
a.	storage tank (above gr)	hydrochloric acid	1,800 g
b.	storage tank (above gr.)	sulphuric acid	1,000 g
c.	containers	plating waste	8,085 g
d.	containers	heat treating waste	1,045 g
e.	WWTU	chromic waste	80 gpm
f.			
g.			
h.			
i.			
j.			

(4) Summarize all releases of hazardous waste or constituents, and check box as to whether company claims it was fully corrected.

	Releases		Corrected?		
a.		Yes ___	No ___	Undetermined ___	
b.	375g. sulphuric acid	Yes X	No ___	Undetermined ___	see note 1. ↓
c.		Yes ___	No ___	Undetermined ___	
d.		Yes ___	No ___	Undetermined ___	
e.		Yes ___	No ___	Undetermined ___	
f.		Yes ___	No ___	Undetermined ___	
g.		Yes ___	No ___	Undetermined ___	
h.		Yes ___	No ___	Undetermined ___	
i.		Yes ___	No ___	Undetermined ___	
j.		Yes ___	No ___	Undetermined ___	

(5) Certification: Yes X No ___

(6) Is additional information necessary? Yes X No ___

(7) Comments: ① Spill of 375 gallons of sulphuric acid from ruptured tank piping. Appears to have been corrected; IEPA inspected site.
② Need more data on waste treated in WWTU. Review Part A.
③ Signature for certification is Manager, Corp. Facility Services; may not be adequate.